



ADVISORY NEIGHBORHOOD COMMISSION 1A

SMD 1A01 – Layla Bonnot
SMD 1A04 – Matt Goldschmidt
SMD 1A07 – Jen Bundy
SMD 1A10 – Rashida Brown

SMD 1A02 – Teresa Edmondson
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SMD 1A03 – Zach Rybarczyk
SMD 1A06 – Angelica Castañon
SMD 1A09 – Michael Wray
SMD 1A12 – Jason Clock

February 12, 2020

(via email only)

Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Transportation Element

Dear Director Trueblood,

Overall, ANC 1A supports new language in the District's Transportation Element of the Comprehensive Plan Amendments to maintain and improve the District's transportation system by improving safety, mobility, and accessibility of transportation for current and future residents, visitors, and workers alike, with a focus on supporting alternatives to single occupancy automobiles and improving public transportation access and efficiency. As the ANC has noted on many occasions, many of these improvements depend on a well-run, receptive, transparent, and communicative District government, which provides regular updates, education, and rationale for ongoing projects, and is committed to maintaining transportation infrastructure after it is installed.

Support for Specific Policies and Actions

- Policy T-1.1.1 through Policy T-1.1.8, and Policy T-1.3.1: Transportation-Oriented Development, Assessment, and Employment
 - ANC 1A is supportive of ensuring that current and future development in the District is supported by robust, multi-modal transportation options that are accessible to residents, workers, and visitors alike. These policies include *Policy T-1.1.1: Transportation Impact Assessment*, *Policy T-1.1.2: Land Use Impact Assessment*, *Policy T-1.1.3: Context-Sensitive Transportation*, *Policy T-1.1.4: Transit-Oriented Development*, *Policy T-1.1.5: Joint Development*, *Policy T-1.1.6: Transportation Support Facilities*, *Policy T-1.1.7 Equitable Transportation Access*, *Policy T-1.1.8 Minimize Private Parking*, and *Policy T-1.3.1: Transit-Accessible Employment*.
 - *Policy T-1.1.6: Transportation Support Facilities*: Transportation facilities, such as bus garages, need to serve the entire transportation system which is multi-jurisdictional. Therefore, we need to know where facilities like bus garages may need to be located and factor in cost of land and lost opportunity for other uses. The best location for some facilities may be in Virginia or Maryland, so DC must work with regional partners. New facilities located in the District of Columbia need to adopt a co-location model, where the garage is part of a larger use that may include housing.
- Action T-1.2.A: Cross-Town Corridors

- ANC 1A strongly supports the implementation of the Crosstown Multimodal Transportation Study, with regular progress updates and feedback provided to ANCs from DDOT.
- Policies and Actions under Section T-1.4: Placemaking in Public Space
 - ANC 1A supports the policies and actions added to activate small non-transportation areas of land that exist within the public right-of-way, with special attention paid to reducing excessive permitting processes and other barriers that prevent use of these spaces. Permitting processes should be accessible, culturally respectful, affordable, and available in multiple priority languages. These policies and actions include *Policy T-1.4.1: Street Design for Placemaking*, *Policy T-1.4.2: Cultural Use of Public Space*, and *Action T-1.4.A: Develop a Placemaking in Public Space program*.
- Policy T-2.1.1 and T-2.1.2; Action T-2.1.A, C, D: Improving Surface Transit and Encouraging Public Transportation Access
 - ANC 1A supports efforts to improve bus service and performance in the District, and strongly supports efforts to right-size and reconfigure Circulator routes to meet the transportation needs of residents that are underserved in terms of transportation access to commercial and public spaces.
- Policy T-2.2.3: Airport Connections
 - ANC 1A supports this policy, but recommends that the 14th Street limited stop bus (59) continue south and connect with National Airport rather than terminate at the National Mall. The 14th Street corridor is underserved by Metrorail, and as such, currently has not good connections to National. Improved, multimodal bus-airport connections are greatly needed.
- Policies and Actions under T-2.3 Bicycle Access, Facilities, and Safety
 - ANC 1A supports continued expansion of the District's bicycle transportation network, including protected infrastructure, and expanded access to the District's Capital Bikeshare system. These policies and actions include *Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning*, *Policy T-2.3.2: Bicycle Network*, *Policy T-2.3.3: Bicycle Safety*, *Policy T-2.3.4: Capital Bikeshare*, *Policy T-2.3.5: Capital Bikeshare Access*, *Policy T-2.3.6: Dockless Programs*, *Action T-2.3.A: Bicycle Facilities*, *Action T-2.3.C: Performance Measures*, *Action T-2.3.D: Capital Bikeshare Community Partners*, and *Action T-2.3.E: Dockless Sharing Programs*.
 - *Policy T-2.3.6: Dockless Programs*: In an effort to improve pedestrian access to and safety on sidewalks, ANC 1A supports the creation of dedicated on-street parking areas for dockless vehicles, coupled with mandatory creation of incentive programs from dockless vehicle operators to encourage their use.
- Policies and Actions under T-2.4 Pedestrian Access, Facilities, and Safety
 - ANC 1A supports efforts to maintain and improve pedestrian facilities, the District's most vulnerable road users, with special emphasis on maintaining and repairing existing infrastructure. These policies and actions include *Policy T-2.4.1: Pedestrian Network*, *Policy T-2.4.2: Pedestrian Safety*, *Policy T-2.4.3: Traffic Calming*, *Policy T-2.4.4: Sidewalk Obstructions*, *Action T-2.4.A: Pedestrian Signal Timings*, *Action T-2.4.B: Sidewalks*, and *Action T-2.4.F: Pedestrian and Bike Events*.
 - *Policy T-2.4.4: Sidewalk Obstructions*: ANC 1A notes that many areas of Ward 1 have narrow streets and sidewalks resulting in street lights located on sidewalks that impede use of wheelchairs and strollers. In these instances, some people use the streets instead.

The District must acknowledge this problem, and on streets where these conditions exist, bump outs into the “parking” lane should be considered for street lights so that the infrastructure can be relocated to make these sidewalks passable and ADA compliant.

- Policies and Actions under T-2.5 Roadway System and Auto Movement
 - ANC 1A supports efforts to reduce traffic congestion in the District and maintain existing roadway infrastructure, while prioritizing safety for vulnerable road users including cyclists and pedestrians. These policies and actions include *Policy T-2.5.1: Creating Multi-Modal Corridors*, *Policy T-2.5.2: Managing Roadway Capacity*, *Policy T-2.5.3: Road and Bridge Maintenance*, *Policy T-2.5.4: Traffic Management*, and *Policy T-2.5.5: Natural Landscaping*.
 - *Action T-2.5.B: Signal Timing Adjustments*: The District currently has an antiquated and labor-intensive traffic control system. Traffic Signal timing is not centrally controlled and can only be adjusted by crews making adjustments to the equipment on site. Intelligent transportation systems (ITS) apply communications and information technology to provide solutions to congestion as well as other traffic control issues. ITS information ranges from real-time traffic conditions to sensors for weather conditions to toll booth information. Things like variable message signs can warn of Amber Alerts, accidents, speed limit changes or delays. ITS controls the flow of traffic via traffic signals, or by opening and closing special lanes based on traffic conditions. Video surveillance cameras are also a big part of the ITS infrastructure, adding to the network bandwidth demands. Installation of an ITS in the District is necessary to achieve optimal traffic flows and efficiency.
- Policies and Actions under T-2.6 Addressing Special Needs Accessibility for All Residents
 - ANC 1A supports continued efforts to provide multi-modal transportation options for populations who cannot drive or do not have access to a car, including people with disabilities and limited mobility, and seniors.
- Policies and Actions under T-3.1 Transportation Demand Management
 - ANC 1A is generally supportive of a push to further investigate Transportation Demand Management strategies and how they could be implemented in the District. Specifically, ANC 1A supports well-regulated car sharing services (*Policy T-3.1.3: Car-Sharing*), and more efficient and better regulated operation of private shuttle services (*Action T-3.1.C: Private Shuttle Services*), as these shuttles operate heavily in our Commission. ANC 1A also supports the additions to *Action T-3.1.D: Transit Ridership Programs*.
- Policies and Actions under T-3.2 Curbside Management and Parking
 - ANC 1A recognizes the shortage of curbside space, a limited public resource, available in the District and in our Commission, and generally supports the policies and actions proposed under T-3.2 to put these public resources to best use. These policies and actions include *Policy T-3.2.1: Parking Duration in Commercial Areas*, *Policy T-3.2.2: Employing Innovations in Parking*, *Policy T-3.2.3: Repurposing Parking*, *Action T-3.2.A: Short-Term Parking*, *Action T-3.2.B: Car-Share Parking*, *Action T-3.2.C: Curbside Management Techniques*, *Action T-3.2.D: Unbundle Parking Cost*, *Action T-3.2.E Manage Off-Street Parking Supply*, and of particular interest to ANC 1A because of its proximity to the DC USA parking facility, *Action T-3.2.F Encourage Shared Use Parking*.
 - *Action T-3.2.C: Curbside Management Techniques*: ANC 1A encourages DDOT study the availability of off-street parking within Residential Permit Parking zones to determine

the percentage of available off-street parking within the RPP areas of the District. Residents who own vehicles in RPP zones and have access to off-street parking should be required to first use their available off-street parking space as a prerequisite for eligibility to participate in the RPP program. In order to participate in an existing RPP program, the following conditions would be considered:

§ Properties with usable off-street parking would be required to use it.

§ Properties would not be eligible to apply for a residential parking permit if the on-site space is unusable for reasons within the owner's control, such as the size or weight of their vehicle.

§ On-site parking would be deemed to be available where it can accommodate a medium-sized passenger vehicle. In determining whether an on-site parking space exists, DDOT would take into consideration the following conditions:

- accessibility by a vehicle;
- the presence of a garage door or roller door;
- the existence of a vehicular curb ramp;
- the presence of a carport or garage structure;
- evidence of the space being used for parking;
- any approved or registered plans.

§ Property owners applying for parking permits would be required to disclose on the application form how many on-site parking spaces exist at the property. DDOT would be required to maintain a record of on-site parking supply at each eligible address.

§ If a property has on-site parking, it would have a reduced entitlement to resident parking permits; however all properties would continue to have full entitlement privileges to visitor passes and Reserved On-Street Parking for Residents with Disabilities. For properties with available on-site parking, the permit entitlements would be:

- Properties with no on-site parking would have full eligibility for residential parking permits
- Properties with available on-site parking spaces would be required to register vehicles to the on-site parking spaces first, with RPP stickers available only to vehicles unable to be accommodated by available on-site parking spaces.

- Policies and Actions under T-3.3 Goods Movement
 - ANC 1A is generally supportive of the policies and actions proposed under T-3.3. ANC 1A is specifically supportive of *Policy T-3.3.7 Truck Routing and Parking* and *Action T-3.3.C: Enhance the Loading Zone Program* to address ongoing commercial loading and offloading issues in our Commission.
- Action T-3.5C: Shuttle and Sightseeing Bus Staging
 - ANC 1A is supportive of developing carefully-planned staging zones for shuttle and sightseeing buses to prevent double parking or circling the block adding to congestion. Enforce and apply fines and penalties when sightseeing and shuttle bus permit regulations are violated, similar to *Action T-3.1.C: Private Shuttle Services*.
- Policies and Actions under T-4.2 Safety for All Travelers

- ANC 1A is supportive of the District's Vision Zero goal of eliminating fatalities and serious injuries from the transportation network, including *Policy T-4.2.1: Vision Zero* and *Action T-4.2.A: Vision Zero Action Plan*.
- Policies and Actions under T-4.4 Climate Resiliency
 - ANC 1A is supportive of the District's efforts to adapt to the effects of a changing climate by investing in resilient transportation resources while also mitigating hazardous carbon and particulate pollution.
- Policies and Actions under T-5 Technology and Innovation
 - ANC 1A is generally supportive of the policies and actions under T-5, with a focus on smart regulation and safety as it relates to *T-5.1 Autonomous Vehicles*, and increased deployment and charging infrastructure under *T-5.2 Electric Vehicles*.

Recommendations and Comments

- ANC 1A is concerned about the Transportation Element's reliance on the findings of the 2014 moveDC Multimodal Long-Range Transportation Plan—which tethers streets to specific modal priorities—due to pending Council legislation (B23-0288 - Vision Zero Enhancement Omnibus Amendment Act of 2019) that could require updates to the moveDC plan every two years, with the goal of redirecting 50% of all commuter trips to public transportation and 25% of commuter trips via non-motor vehicle by 2032. ANC 1A supports the goals of the moveDC plan and encourages modal prioritization of District corridors, but we recommend that references to moveDC are stipulated with “or future Multimodal Long-Range Transportation Plans” or similar language.
- Policy T-1.2.4: Providing Roadway Space for All Modes
 - ANC 1A recognizes, especially on smaller streets outside of the original L'Enfant Plan, that dedicated lanes for each type of transportation may not be possible to effectively implement on every corridor, and would instead encourage implementation of dedicated lanes following modal priorities similar to the approach outlined in moveDC.
- Add Action T-2.1.G: Kids Ride Free Transportation Passes
 - Similar to *Action T-2.1.F: College Student Metro Passes*, ANC 1A recommends adding an action that solidifies a partnership between DDOT, WMATA, and DCPS and DCPCS to provide students with passes for use on Metrorail and Metrobus throughout the school year, with specific focus on ease of use, lowering barriers and improving accessibility of picking up, activating, and registering the passes. In addition, passes could be considered for adults registered in adult education classes to encourage public transportation use.
- Policy T-2.2.7: Transportation Network Companies (TNCs)
 - ANC 1A supports the language added to the Transportation Element, but also encourages additional language for the District to regulate curbside space and establish pick up drop off zones (PUDOs) for TNCs to utilize
- Action T-2.3.E: Dockless Sharing Programs
 - ANC 1A encourages the District to provide dockless sharing programs with dedicated parking and drop off spaces as to minimize the impact on public right of way, and require or incentivize use of these spaces when applicable.
- Policy T-2.4.3: Traffic Calming

- ANC 1A encourages the District to simplify and expedite the process for requesting Traffic Safety Assessments, making the status of study and implementation more transparent.
- Action T-2.4.A: Pedestrian Signal Timings
 - ANC 1A encourages the use of Leading Pedestrian Intervals (LPI) at intersections, to provide additional safety to pedestrians when crossing a street.
- Amending Policy T-1.3.1: Transit-Accessible Employment
 - In addition to the current language, ANC 1A recommends amending *Policy T-1.3.1: Transit-Accessible Employment* to include language related to expanding late-night service of Metrorail, or considering expanding other public transportation options for late-night workers.
- Actions under T-3.3 Goods Movement
 - When possible in terms of engineering feasibility and public and environmental health, rail yards in the District should be constructed in a manner that allows them to be decked over in support of public uses and/or development. Rail yards are important assets for the District's transportation network, but the air rights above them are equally important and must be leveraged to create opportunities for commerce, public amenities, and housing.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

Certification:

After providing sufficient notice for and with a quorum of 11 present at its February 12, 2020, meeting, Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 11 Yeas 0 Nays 0 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A



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February 12, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Mid-City Area Element

Dear Director Trueblood,

On the evening of February 12, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following positions, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Mid-City Area Element.

Recommendations

After careful review and consideration, ANC1A ***Recommends*** that language be added to the Mid-City Area Element to address the following issues:

- **Overview 2000**
 - ANC1A supports this language as it recognizes significant historical milestones and accurately captures current changes to neighborhood demographics. Moreover, ANC1A strongly recommends modifying section 2000.5 to recognize additional neighborhood associations and civic groups that have made meaningful contributions to enhanced community engagement and the vitality and improved conditions of the Georgia Avenue Corridor and Park View neighborhood as whole. These associations and groups include the “Luray-Warder Neighborhood Association, Park View United Neighborhood Coalition, Pleasant Plains Civic Association and Georgia Avenue Thrive.” In addition, ANC1A recommends including language in the History 2001 section recognizing the development of Park Morton and Garfield Terrace's contribution to the community providing affordable housing for low-income individuals, families and seniors.
- **Preservation of Warehouses**
 - ANC1A strongly recommends that language be added as both a policy and an action to protect, preserve, and adaptively repurpose when needed, large warehouse properties along the rail lines in the easternmost section of Mid-City. Warehouses that come to mind include the National Geographic warehouse, the Stone Straw building, the Sanitary Grocery warehouse, and the Woodward and Lothrop warehouse. Even smaller warehouses such as the one at 336 Randolph Street, NE, are important to preserve. Much like older apartment buildings, these older warehouses have the potential of supporting a diversity of activities and uses beneficial to the District's business, arts, and housing

goals in a much more cost-effective manner than could be achieved with newer construction. Additionally, these buildings are often larger than the structures in abutting residential areas, making them ideally suited for a mix of uses that is not otherwise achievable elsewhere without changing the area's current zoning – which is often met with opposition when undertaken.

- **Action MC-1.2.C: Recreation Centers**

- Regarding this action item, we are of the opinion that language should be added to work with the Army Corps of Engineers to regain access to the historic Bloomingdale playground site and re-establish the section of McMillan Park where the fountain once existed. Re-installing the McMillian fountain should be a long-term goal. Additionally, the historic field house for Bloomingdale/McMillan playground still exists on the reservoir site. This goal should be pursued via a long-term land lease to reopen and restore the neighborhood serving greenspace that has long been denied to the surrounding community.

- **Policy MC-2.1.1 Revitalization of Lower Georgia Avenue**

- Regarding this policy item, ANC1A appreciates the comprehensive plan's existing text and its recognition of the existing needs of the Georgia Avenue Corridor. Recognizing the changing demographics of the District of Columbia and need to retain and create affordable options for family-sized housing and child care, ANC1A strongly supports including language in this section to insert "mixed income housing including family sized options" and "early childhood facilities."

- **Policy MC-2.1.4: Howard University**

- Regarding this policy item, ANC1A appreciates the comprehensive plan's existing language recognizing the continued relationship between Howard University and the adjacent residential community. This is demonstrated through ANC1A, ANC1B and the greater community's partnership with the Howard University Community Association and Office of Off-Campus Housing and Community Engagement. ANC1A strongly supports additional language recognizing the housing needs of students and their increased access to on and offsite affordable housing options for students. As the current stock of student housing decreases, more affordable residential options should be available to meet the housing demands of current and incoming students.

- **Action 2011.3 Park Morton New Community**

- Regarding this action item, ANC1A appreciates the existing language and text amendments updating the description of the New Communities Initiative at Park Morton. In addition to recognizing the replacement of the existing public housing units and affordable "workforce" and market rate housing to create a new mixed income community, ANC1A strongly recommends adding language to recognize the District of Columbia's commitment to publicly accessible park space at both Park Morton and proposed Build First sites as a part of Park Morton's redevelopment and increasing Park View's community amenities, sustainable infrastructure and new neighborhood connections. ANC1A also strongly recommends adding language that makes connections to the New Communities Initiative as a key element to future revitalization plans of the Lower Georgia Avenue Corridor, reinforcing sustainable design principles and architectural design guidelines that are compatible with the existing neighborhood character and strengthening east/west street connection and access to the community by linking Morton Street to Georgia Avenue and Warder Street N.W.

- **Policy MC-2.2.3: Park Capacity**

- We strongly support inclusion of the language “**Continue to improve the quality of existing parkland and outdoor recreation facilities**” in this policy and recommend expanding the language further to read as: “Continue to improve and maintain the quality of existing parkland and outdoor recreation facilities.” The neighborhoods within ANC1A are underserved by parks and open spaces. Because of this, this issue has demanded a lot of our attention. It is our observation that:
 - The District has full management authority of many parks and open spaces owned by the Federal Government. While many of these parcels have use restrictions requiring that they continue to be used for public recreation purposes, this restriction does not dictate passive park space nor ban our local government from making improvements such as park benches, art installations, gateway signs, or public fountains. The District Government needs to be more engaged with these parks and invest in neighborhood serving community improvements.
 - By and large, the District government also fails to adequately maintain public parks and open spaces – such at the Columbia Heights Civic Plaza or the park at 14th and Girard streets, NW. This is unacceptable as it decreases the overall quality of life, especially for lower income families and residents living in apartment buildings. Maintaining these spaces is an issue of equity, as they are community gathering spots, support community events, farmers markets, and celebrations.
- Regarding the new Action MC-2.2.D: Crosstown Study, which merely states “Implement the recommendations of DDOT’s Crosstown Study,” we recommend that you add language that this implementation will be in collaboration with impacted ANCs. ANC1A has been working diligently with DDOT to address community concerns on issues related to the Crosstown Study, and several later phases of the study have yet to have clear conclusions or recommendations. As ANCs live among the communities they represent, they often have a clearer understanding of daily impacts of present conditions and insight into potential win/win solutions.
- ANC1A Recommends that an Action item be added as a counterpart to the language “and a district with prominent LGBTQ sites” added to Policy MC-2.3.4: Cultural Tourism. While we are excited and supportive of this new language, without an action recommending how to support LGBTQ cultural tourism, its inclusion will likely not result in the promotion of LGBTQ history and culture. Equitable actions would be to promote LGBTQ sites, history, and culture in similar manners as the Cultural Tourism heritage trails, the African American heritage trails, cultural markers at important sites, and even preservation of the most historically significant sites.

Concerned

After careful review and consideration, ANC1A is **Concerned** to the updated versions of the following Policies:

- **Action MC-1.1.D: Off-Street Parking**

- Overall, we are concerned with the removal of the language “off-street parking facilities” from this Action item. While ANC1A does not support the construction of large-scale parking garages for the use of non-District residents, we also don’t agree that entirely

eliminating parking facilities from consideration is the correct path. There are instances where small-scale underground parking facilities would benefit the community and result in fewer vehicles parked in public space. Historically, before automobiles public stables existed for resident's horses. In the early 20th Century public and private garages began to replace stables for automobile storage. The primary problem we are confronted with today is that over time public space became the preferred place for residents to store private vehicles. On-street parking significantly reduces the District's ability to develop and build out a multimodal traffic network – delaying or mothballing efforts to expand protected bike lanes and dedicated bus lanes. As the District moves forward to more equitably use public space to improve transportation in a multimodal approach, we ask that “off-street parking facilities” not be removed from the conversation entirely. ANC1A is not advocating for large-scale investment in or construction of parking garages. Rather, we are advocating for every option to be on the table for consideration as we rethink use of public space and transportation priorities.

Support

After careful review of the proposed changes to the Mid-City Area Element, ANC1A *Supports* the following proposed Policy and Action amendments:

- **Policy MC-1.1.11: Stormwater Management for Interior Flooding AND Policy MC-1.1.12: Green Development Practices**
 - The Commission supports the inclusion of these two new policies. While Bloomingdale and LeDroit Park are specifically mentioned with regards to stormwater runoff impacts, we strongly encourage efforts to address stormwater management and green development practices in the entire Mid-City area.
- **Policy MC-1.2.4a: Public Art**
 - We strongly support the inclusion of this policy element, particularly with efforts to use gateway signs that support neighborhood culture, art, and placemaking. We recognize that every neighborhood is different, and that diversity and culture must be celebrated. Gateway signs and art, whether at neighborhood boundaries or placed in civic plazas, help to bridge understanding between and knit together newer residents with lifelong Washingtonians.
- **Action Policy MC-2.1.2: Segmenting the Corridor Identity**
 - We support the changes made to this action and agree that each neighborhood along Georgia Avenue has a rich history that can and should be celebrated. We also strongly support the sections that have been identified for each neighborhood.
- **Policy MC-2.1.5: Crosstown Connectivity AND Policy MC-2.1.6: Pocket Parks and Plazas**
 - ANC1A supports the inclusion of both of these new policies. These align with multi-year efforts of the Commission to improve transportation and preserve, improve, and expand parks and open spaces within our community.
- **Policy MC-2.2.6: Mid-14th Street Commercial District**
 - We strongly support the added language to this policy, and suggest OP review our recommendations for amendments to the Future Land Use Map. Those recommendations identify parcels where increased density would support the future economic development of this section of 14th Street with little negative impact on the surrounding community.

Mixed Support

After careful review of the proposed changes to the Mic-City Area Element, ANC1A offers the following comments on an amendment where ***Support is Mixed***:

- **Action MC-1.2.A: Tailored Design Guidelines**

- o ANC1A's support is mixed on this policy. While we are disappointed and oppose the removal of language referencing Conservation Districts, we support the inclusion of language to create design guidelines for historic neighborhoods that are not officially recognized as historic districts. If the Office of Planning is going to discard efforts to create Conservation Districts, it must do a better job of design review during the permitting review process and especially in Zoning and Board of Zoning Adjustment cases. ANC1A's experience in the past few years has been that design review by the Office of Planning still results in as much damage to the architectural fabric of century-old neighborhoods as it does good. We encourage the Office of Planning, and especially the Historic Preservation Office, to establish design guidelines for every neighborhood where the majority of buildings were constructed before 1925 **AND** that the Office of Planning adhere to those guidelines when reviewing zoning and BZA cases.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

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After providing sufficient notice for and with a quorum of 11 present at its February 12, 2020, meeting, Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 11 Yeas 0 Nays 0 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



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February 12, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Housing Element

Dear Director Trueblood,

On the evening of February 12, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following positions, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Housing Element.

Comments

ANC1A offers the following general comments:

- **Land Value Recapture, Neighborhood Investment Funds, and Neighborhood Tax Increment Financing**
 - There are a number of ideas currently under discussion in the community – some new, others older but not fully realized – which center on a core principle that the future land value in our gentrifying neighborhoods be leveraged and reinvested in these same neighborhoods for the benefit of the communities that live there. This is especially important for communities of color, long-term residents, seniors, and lower income households. We recommend that the Office of Planning review these various ideas and include both a Policy and Action item into the Comprehensive Plan – both in the Housing element and other relevant sections – that clearly establishes this as a priority. In 2014, ANC1A unanimously passed a resolution requesting the re-establishment of the Columbia Heights Neighborhood Investment Fund, which was ignored (attached). ANC1A is also interested in the idea of Neighborhood TIFs, which other cities have used to provide interest free grants for seniors and lower income households to make needed repairs on their homes, which has the dual benefit of supporting long-term residents as well as keeping the entire neighborhood in good repair for future generations. Land Value Recapture takes an approach of linking inclusionary housing with changes in zoning. ANC1A agrees that there are different approaches to achieve complimentary outcomes that can achieve the desired outcomes of increasing housing, maintaining and expanding affordable housing, and reinvesting in our established neighborhoods for future generations. Following are two specific outcomes ANC1A would like to see:
 - In rapidly changing and gentrifying neighborhoods where property taxes are escalating, the amount of tax going into the general fund should remain flat for a

set period of years, perhaps with modest readjustments in five-year increments. The additional tax revenue can then be set aside for interest free grants for residents to undertake significant capital projects such as porch and roof repairs or brick repointing. This benefits our neighborhoods long-term stability by stabilizing our housing stock and reducing demolition by neglect;

- A percentage of the increased tax revenue from larger development projects, especially PUDs, needs to be funding Neighborhood Investment Funds which, with community input, can be invested in upgraded streetscapes, school improvements, park and public space upgrades, etc. In Columbia Heights, the revenue from the DCUSA Parking Garage was originally intended to be used in this manner, but the funds were redirected to the general fund as the community lacked a Main Street organization at that time. This is no longer the case.

- **Policy H-1.2.4: Housing Affordability on Publicly Owned Sites**

- Generally, ANC1A is supportive of the changes to this policy and thinks it is logical to review future development of District owned land – or land transferred from the Federal Government – for larger development that results in more housing with deeper affordability. We also strongly support development that co-locates housing with fire stations, libraries, schools, and other government services. However, we also recognized that all opportunities are not equal. In addition to land and density, development needs to be considered in its neighborhood context and take into account factors such as localized poverty, household incomes, existence of amenities like parks and open spaces, the strength of the local business community, and other factors. We would recommend that the Office of Planning develop a matrix to weigh these various factors as part of any large development review to increase amenities, avoid creating concentrated poverty, and ensure that new housing produced is affordable to families across the entire income spectrum in every community.

- **Policy H-1.2.5: Policy H-1.2.5: Moderate Income Housing**

- ANC1A has no issues with the text change to this policy. We noted, however, that it calls out the housing needs of teachers, fire fighters, police officers, etc. We laud the goal of creating housing affordable to these essential professions but note that housing that is considered affordable for these professions alone doesn't necessarily result in these professionals choosing to live in the District of Columbia. Due to fair housing laws, housing cannot be specifically set aside for these professions alone. Therefore, we recommend that the District consider pay incentives for these professionals and all District employees when they choose to live in Washington. For example, teachers, firemen, police officers, and other District employees could receive a one-time signing bonus if they graduated from a DC school. Additionally, they could receive an annual salary adjustment/bonus if they live in the District of Columbia. We recognize that compensation of these professions is outside the scope of the Comprehensive Plan but include it in these comments to be shared with the Mayor and DC Councilmembers. If we value these professionals and want them to live in the District of Columbia, we need to invest in both moderate-income housing AND compensate them appropriately.

- **Action H-1.2.D Land Banking**

- We recognize that much progress has been made to address landbanking of vacant and underperforming property in the District and understand OP's impulse to remove this Action item. ANC1A requests that OP reconsider removal of this Action item and instead

consider revising it as needed. Landbanking still exists with a number of prominent parcels on Georgia Avenue (see Square: 3039, Lot: 135 for one example). The District Government widely recognizes that there is an “affordable housing crisis” in Washington but has proven to be unwilling to consider Eminent Domain as one of the tools at its disposal. ANC1A does not suggest that Eminent Domain be the District’s first option, nor that it be abused to wrongfully redistribute personal property. However, we do suggest that it is a viable option when both parties have agreed in principle to transfer land ownership and good faith efforts have come up short. The above noted property is one such example where the failure of the District Government to get involved resulted in delaying the redevelopment of the Park Morton Apartment Complex, where low-income residents are still waiting for the modern, clean, and safe housing every resident deserves.

- **Policy H-1.5.1: Land and Building Regulations**

- This policy states that “The District’s land regulations, including its housing and building codes, its zoning regulations, its construction standards, and its permitting fees, should not prevent the production of housing for all income groups.” ANC1A agrees with this statement and encourages the inclusion of language that would increase the production of Accessory Dwelling Units. However, ANC1A is also resolved that *the District’s building codes should prevent the production of housing that is low-quality and uninhabitable*. This is particularly true with newer mixed-use buildings that consist of ground floor retail and residential units above. There are many examples where the commercial space is filled by a bar, tavern, or restaurant that is situated directly below a residential apartment. The noise bleed from commercial space to the apartment unit is severe and creates a space in which many find it difficult to live. The District’s building codes should be reviewed and strengthened to eliminate the issue of noise bleed into residential units.

- **Rent Control:** The Commission notes and does not object to the modified language for **Policy H-2.1.6: Rent Control**. However, we feel that much more could be stated about Rent Control in this policy or with a paired Action item and that leaving the language as proposed misses out on an opportunity to improve this important tool. The need for the DC Council to renew rent control so that it doesn’t expire (currently every 10 years) is absurd. Rent control should be perpetual until Council action is taken to end it. Furthermore, rather than define buildings as qualifying based on a set date of construction, which currently exempts buildings constructed after 1975, it is more reasonable to strengthen rent control so that all buildings become subject to rent control once they achieve a certain age – say 15 or 20 years. Over time, this could lead to an increase in rental units throughout the District that are more affordable.

- **Policy H-2.2.2: Housing Maintenance AND Policy H-2.2.3: Tax Relief:** As the goals of these two policies are to help residents and seniors maintain their homes and properties and prevent them from being displaced from their homes, we urge the Office of Planning to consider the potential of creating Neighborhood Tax increment financing (TIF), which would leverage the ever increasing value of neighborhoods to make grants available to low-income families and seniors for repairs to their property. In the District of Columbia, TIFs have only been used for individual developments, but other cities have used them for neighborhood reinvestment and the District should consider if that use would work for our neighborhoods as well.

Recommendations

After careful review and consideration, ANC1A **Recommends** that language be added to the Housing Element to address the following issues and oversights:

- **H-4.3 Meeting the Needs of Specific Groups – LGBTQ Community**

- ANC1A strongly recommends that language be added identifying the LGBTQ community as a “Specific Group”, recognizing the unique needs of this community, and outlining specific housing strategies to address their needs. We note that Persons with HIV/AIDS, Older Adults, and other identified groups may address *some* of the needs ... but they fall short of fully and comprehensively understanding overall housing needs and homelessness in the LGBTQ community. Specifically, the three following areas need to be addressed in the comprehensive plan and are currently absent:

- LGBTQ Seniors: LGBTQ adults face unique circumstances, such as fear of discrimination. Many do not have children to help them in older age. Senior housing, transportation, legal services, support groups and social events are the most commonly cited services needed in the LGBT community. LGBTQ older adults are generally an underserved and understudied population, yet, by 2060 their numbers will exceed five million, and will account for more than 20 million older adults, including those who do not publicly self-identify but have engaged in same-sex sexual behavior, or romantic relationships, and/or are attracted to members of the same sex. Much of this increase is fueled by millennials.
- LGBTQ Youth Homelessness: LGBTQ young people are 120% more likely to experience homelessness than non-LGBTQ youth. Right off the bat, these young people are presented with an uneven playing field. It's estimated that about 7% of youth in the United States are LGBTQ, while 40% of youth experiencing homelessness are LGBTQ.
- Transgender Housing and Homelessness: One in five transgender people in the United States has been discriminated when seeking a home, and more than one in ten have been evicted from their homes, because of their gender identity. The U.S. Department of Housing and Urban Development (HUD) has issued guidance stating that discrimination against transgender renters or homebuyers based on gender identity or gender stereotypes constitutes sex discrimination and is prohibited under the Fair Housing Act (FHA). Unfortunately, general lack of awareness has contributed to continued discrimination, eviction and homelessness of transgender people in the United States. In the District of Columbia, LGBTQ leaders have also identified that service gaps exist for Transgender youth who age out of housing and are forced to live on the streets as they have not been homeless “long enough” to qualify for adult housing services.

- **Policy H-1.2.6: Build Capacity of Non-Profit Sector**

- ANC1A wholeheartedly approves of the amendments and new text for this section, particularly as it relates to faith-based institutions. An example that comes to mind within our area is Trinity AME Zion Church, which owns a number of parcels which they acquired from the Redevelopment Land Agency (RLA) years ago. While the goal of the church was to build much-needed housing, these lots have been used as surface parking lots for the congregation (and unofficially for non-district residential commuter parking during the week). This is a good example of where technical assistance and access to capital are needed to achieve the church's long-term housing goal.

- **Policy H-3.1.1: Increasing Home Ownership**

- Overall, one way many families have achieved home ownership over the years is by renting to own, yet there is no such program in the District of Columbia. Such a program should be explored. Housing cooperatives are another way other cities have encouraged as they can be a good bridge for affordability. We equally encourage OP to explore if there are additional ways to support or expand co-op opportunities in the District in support of the goal of increasing home ownership. Additionally, we believe the city should have an action to explore additional methods to support residents living in affordable rental units to be able to purchase homes or cooperatives in the District. Currently there are barriers or limited opportunities to move from long-term renting to home ownership.

Concerns and Opposition

After careful review and consideration, ANC1A is **Concerned or Opposed** with the following new or updated areas:

- **Action H.1.1.D: Research New Ways to Expand Housing**
 - This new section includes the following language which we find concerning: “Consider a broad range of options to address housing constraints which could include updating the Height Act of 1910”. ANC1A is opposed to any effort to update the Height Act of 1910 if that effort is not part of a larger planning strategy and vision following a public process. ANC1A is not opposed to exploring changes to the Height Act of 1910 if and when changes are beneficial to the District of Columbia. However, we note that current zoning laws are far more restrictive of height than the Height Act. Because of this, any effort to revisit the Height Act achieves nothing by itself and must be part of a larger land-use review and policy that includes zoning, a vision of where additional height would be located and beneficial, and protections for District residents – especially lower income families and communities of color – to ensure that any resulting development is equitable and minimizes displacement.
- **Action H-3.1.A: HPAP Program**
 - ANC1A supports the new language in this action item but is concerned that the language does not go far enough. This is especially true when considering the District residents HPAP is primarily established to help. HPAP provides interest-free loans and closing cost assistance to qualified applicants to purchase single family houses, condominiums, or cooperative units. The HPAP zero percent interest loan for borrowers with incomes below 80 percent of the area median income (AMI) is deferred until the property is sold, refinanced to take out equity, or is no longer their primary residence. Moderate-income borrowers who earn between 80 percent and 110 percent AMI will have payments deferred for five years with a 40-year principal-only repayment period. HPAP assistance is first and foremost for very low--to-moderate income residents of the District, though if these residents do not apply for assistance, other residents can apply for the assistance subject to funding availability. The program was not designed to prioritize assistance for those who are in careers that will lead to substantial incomes over time via raises and promotions – though many individuals early in their career will meet HPAPs criteria and some have received HPAP assistance. With this in mind, DHCD needs to review its HPAP process and track its awardees’ income over time to ensure that the program is reaching those that need it most. When those who have received HPAP assistance from

DHCD have advanced professionally resulting in significant salary increases from the time of purchasing their first homes to the date that they sell that property, DHCD should consider creating a program requirement that a portion of the original HPAP assistance be converted from the original interest free loan to a low-interest loan so that funds continue to be available for the individuals who the program has identified as its highest priorities.

Support

After careful review of the proposed changes to the Housing Element, ANC1A ***Supports*** the following proposed Policy and Action amendments:

- **Policy H-1.1.2: Production Incentives AND Policy H-1.1.4: Mixed Use Development**
 - The Commission supports the text revisions to these two policies. We agree that thoroughfares that are well served by transit such as Georgia Avenue, are ideal locations for mixed-use development. We also agree that development near transit hubs such as Metro Stations can more easily support more density and increase the District's housing supply than areas poorly served by transit.
- **Policy H-1.3.1: Housing for Larger Households**
 - The Commission supports the changes to this policy and appreciates the recognition of both the need for housing that supports larger households and that larger households may include extended families or family groups. This is especially critical as today's families struggle with balancing the financial demand of maintaining and affording housing and child care within the District of Columbia. This unfortunate struggle oftentimes leads to parents making the tough decision of moving outside of the city to find more affordable options that meet their unique housing needs such as family household size within a single home. We must ensure that DC's families have more affordable housing options to remain in their current living environment and where they have access to employment and child care in or nearby their community. This language aligns with provisions in sections 500.20 and 500.21. The need for more affordable family sized housing is also a critical factor in other social issues affecting family homelessness and the retention of foster homes in this city. Children who come to the attention of the foster care system should be able to maintain strong family and school connections close to their birth environments. Therefore, we must recognize that the lack of affordable housing in the District of Columbia complicates other service and systemic barriers affecting at-risk children and families in this city. With the closing of DC General and creation of short-term family housing in various wards, it would be most beneficial to ensure that there is a stronger pipeline for homeless families to have access to quality affordable housing upon leaving temporary housing facilities. As the text amendments in section 500.19 suggest, a more viable (and affordable) option that the city could consider is apartment buildings to add larger, family sized units. This could also be a viable option for larger mixed income residential properties receiving heavy District investments. Additionally, more programming through the DC Department of Housing and Community Development could also offer more affordable housing resources to families of all income levels seeking rental and homeownership opportunities with increased investments by the District of Columbia. This would help move families on a path towards economic mobility and end multigenerational cycles of poverty.
- **Action H-1.4.G: Co-Location of Housing with Public Facilities**

- We strongly support the inclusion of this action element. Co-location of housing with public facilities allows the District to leverage public land for the highest and best public use and to achieve the District's housing goals. The Rita Bright center is a great example of where this is currently happening, and the Columbia Heights and U Street fire stations, along with the 3D police station, are locations which hold great potential to increase housing on property currently zoned for higher density than currently exists.
- **Action H-4.2.F: Daytime Services Center**
 - We strongly support this new Action item and feel that places like the Columbia Heights Civic Plaza would be greatly benefited by it. We also know that there are spaces within the DC USA mall such as at the corner of Irving Street and Holmead which are not currently being use and could be available to support such a program. Owners of vacant commercial properties who make their property available for Daytime Service Centers could be rewarded with a lower tax rate on the square footage used for the service center. Lastly, in addition to connecting homeless residents with needed services, the service centers should include restrooms and even showers.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

Certification:

After providing sufficient notice for and with a quorum of 11 present at its February 12, 2020, meeting, Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 10 Yeas 0 Nays 1 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



ADVISORY NEIGHBORHOOD COMMISSION 1A

SMD 1A01 – Layla Bonnot
SMD 1A04 – Matt Goldschmidt
SMD 1A07 – Jen Bundy
SMD 1A10 – Rashida Brown

SMD 1A02 – Teresa Edmondson
SMD 1A05 – Christine Miller
SMD 1A08 – Kent C. Boese
SMD 1A11 – Dotti Love Wade

SMD 1A03 – Zach Rybarczyk
SMD 1A06 – Angelica Castañon
SMD 1A09 – Michael Wray
SMD 1A12 – Jason Clock

February 12, 2020

(via email only)

Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Future Land Use Map Element

Dear Director Trueblood,

On the evening of February 12, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following positions, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Future Land Use Map Element.

Support

After careful review of the proposed changes to the Future Land Use Map (FLUM), ANC1A ***Supports*** the following proposed amendments:

- 9933.2: Changing use from Institutional to Moderate Density Commercial, Medium Density Residential;
- 2363.1: Changing use from Institution to Institutional, Moderate Density Commercial, Medium Density Residential; and,
- 9943: Changing use from Local Public Facilities to Moderate Density Residential.
- 1114: Changing use from Mixed use Low Density Commercial/Moderate Density Residential to Moderate Density Commercial/Medium Density Residential.

Opposition

ANC1A is ***Opposed*** to amendment 9933.1:

- Amendment 9933.1 proposes changing the use of the southern half of the former Bruce Monroe School site (Square 2890, Lot 120) from Institutional use to Moderate Density Residential. The Government of the District of Columbia has made a commitment to the residents of the lower Georgia Avenue community to create a permanent 1-acre park on this site as part of the greater Park Morton redevelopment process. This commitment for a permanent park must be reflected in the FLUM, with the use for the 1-acre park being designated as Parks, Recreation, and Open Space.

Recommendations

- ANC1A ***Recommends*** changing use of Square 3043, Lots 18-20 from Medium Density Residential to Parks, Recreation, and Open Space. The parcels were purchased by the District of Columbia between 2004 and 2008. The residential structures on these parcels were razed and the long-term plan is to create a street connection to the Park Morton community as part of the redevelopment effort. The remaining land on these parcels currently exist as open space. As the surrounding neighborhood is underserved by open space and has a need to increase its tree canopy, this use should be continued and reflected on the FLUM.
- Additionally, ANC1A ***Recommends*** changing the use of the Columbia Heights Civic Plaza (Square 2843, Lot 0834) and the Columbia Heights Community Center (Square 2667, Lot 0074) to Parks, Recreation, and Open Space. Both are currently shown with uses other than parks, yet both are critically important community and recreation areas which much be represented as such in the FLUM.
- Finally, ANC1A ***Recommends*** increasing density on the following properties along the Georgia Avenue, 14th Street, and 16th Street corridors and reflecting those changes as follows:
 - Square 3052: Lots 107-109 & 121-123: Change use from Moderate Density Residential to Moderate Density Commercial, Medium Density Residential. This change would create an opportunity for these parcels to be united with the adjacent Georgia Avenue parcels for larger development that would more successfully achieve the District of Columbia's housing goals in transit corridors.
 - Square: 3038: Lots 57-60, 82, & 83: Change use from Moderate Density Residential to Moderate Density Commercial, Medium Density Residential. These properties are currently surrounded by parcels that either have more density or are zoned for more density. This change creates an opportunity for them to be united with the adjacent parcels for larger development that would more successfully achieve the District of Columbia's housing goals in transit corridors.
 - Square 2897, Lots 54-56, 145, & 147: Change use from Moderate Density Commercial, Medium Density Residential to Medium Density Commercial, High Density Residential. This property is at the transportation hub of the Georgia Avenue Metro Station and is well served by several WMATA bus routes. It is a sensible place for higher density development.
 - Square 3029: Change use from Moderate Density Commercial, Medium Density Residential to Medium Density Commercial, High Density Residential. This property is at the transportation hub of the Georgia Avenue Metro Station and is well served by several WMATA bus routes. It is a sensible place for higher density development.
 - Square 2688 Lot 0054 and Square 2678, Lots 0709 & 0844: Change the use from Mixed use Low Density Commercial/Moderate Density Residential to Moderate Density Commercial/Medium Density Residential. This change will have minimal impact on the surrounding residential uses and provide future development opportunities on these large parcels. This is especially true for Lot 0844 which currently supports Engine Company No. 11/Truck Company No. 6. This government facility is underbuilt and could provide additional housing and/or community services as part of a future co-location project. Also Lot 0054 is across the street from the current recommended change at Lot 0108 (FLUM change 1114)
 - Square 2595, Lots 1039-1048: Change the use from Moderate Density Residential to Medium Density Residential. Currently, these lots about the higher density designation on the north and south. Furthermore, the entire section along 16th Street is zoned RA-4.

While the structures on these lots fall within the Mt. Pleasant Historic District, rowhouses are neither historic nor contribution buildings to that district. Aligning the FLUM density designation with the current zoning may result in additional housing in this area in the future.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

Certification:

After providing sufficient notice for and with a quorum of 11 present at its February 12, 2020, meeting, Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 11 Yeas 0 Nays 0 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



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SMD 1A12 – Jason Clock

February 12, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Educational Facilities Element

Dear Director Trueblood,

On the evening of February 12, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following positions, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Housing Element.

Comments

ANC1A offers the following general comments:

- **Need for Better Alignment of Development Goals, Household Sizes, and Impact on Schools and Child Development Facilities**
 - While ANC1A acknowledges that the relationship between residential development and school facilities is complex, we also recognized that recent policies that encourage the conversion of existing single-family rowhouses into multi-unit buildings often has a long-term negative impact on demand for school facilities and challenges the goal of retaining and attracting households with children. Very little new housing is large enough to house families, and most rowhouse conversions are also two-bedrooms or less, again decreasing family-sized housing. We encourage the Office of Planning to review the District's current housing policies with school facilities in mind. ANC1A understands and supports efforts to increase housing in every District neighborhood, but we also need to maintain and expand housing for families. The outcome of the District's current housing policies have proven to be hostile to families in rowhouse neighborhoods, and if family-sized housing continues to decrease in the coming decade it calls into question the future need for education facilities in some neighborhoods where we are currently expending significant modernization funds.
 - Additionally, according to 2017 population estimates, 45,065 children under the age of 5 reside in Washington, DC. Since that time, the city has been increasing its early learning investments through the Access to Quality Child Care Expansion grants and Capital Quality to help meet the demand for quality infant and toddler child care. With the changing demographics of this city, parents often find themselves moving outside of the District of Columbia to find affordable family-sized housing and child care options that

meet their unique needs. Today's families continue to struggle finding affordable child care where they live and work. Therefore, ANC1A supports the expansion of affordable, high-quality child care that builds on these new investments aimed at creating a strong start for the District's youngest learners. Moreover, policies should support child development facilities and its providers in providing high-quality environments and rich learning opportunities for young children to grow in development and have a healthy trajectory in life. Lastly, with the expansion of mixed-income residential facilities throughout all 8 wards and creation of short-term family housing, ANC1A supports the inclusion of child development facilities that provides ample child care quality and subsidy slots for low-income families within those new development projects.

- **Policy EDU-1.6.e: Preserving Sites Near Transit:**

- We suggest that this policy be updated to encourage, when reasonable, that school sites and child development facilities located near Metrorail and other locations well served by transit be considered for mixed-use development that retains the existing educational uses but also leverages the sites for additional housing or commercial uses. Sites well served by transit are often zoned for higher density than traditional school facilities. We would also suggest that these sites be seen as part of

- **Policy EDU-2.1.5: Shared Use of Public Parks and Recreation Space for Public Schools:**

- ANC1A appreciates and supports the inclusion of this new policy, but also recommends that language be included that acknowledges and supports public access to DCPS open green spaces and recreation spaces to encourage public use. Access to both DCPS and non-DCPS public parks, green open spaces, and recreation spaces needs to be community serving and reciprocal while continuing to serve the educational and safety needs of students.

Recommendations

After careful review and consideration, ANC1A ***Recommends*** that language be added to the Educational Facilities Element to address the following issues and oversights:

- **Policy EDU-1.1.1: Master Facility Planning**

- ANC1A strongly supports the inclusion of language incorporating public charter school facilities as part of the District's educational facilities master planning process. We have long observed that there needs to be better cross-sector coordination of school facilities and their proximity to each other if we are to provide equitable education opportunities to every child in every neighborhood. ANC1A additionally recommends that that access and use of DPR facilities adjacent to DCPS facilities be included in master facility planning effort. While some educational facilities – such as Cardozo High School or Harriet Tubman elementary school – have large school grounds that support athletic fields, playgrounds, or school gardens, other schools – such as the Bruce-Monroe @ Park View school, E.L. Haynes Middle School, or Meridian PCS – have nearly no grounds to support outdoor activities. In the case of the Park View School, the adjacent Park View Recreation Center is relied upon to provide for the school's playground and recreational needs. This relationship needs to be recognized and accounted for in all DCPS master facility planning across the District. Where such symbiotic relationships exist, there needs to be stronger interagency relationships and coordination to ensure that equitable investment is allocated to achieve the desired outcome from the master facility planning

process that supports the needs of our students AND residents as they relate to recreational spaces. In addition to promoting better collaboration across and with agencies, ANC1A supports

- **Policy EDU-1.2.6: Transportation Demand Management Programs for DCPS Facilities and Action EDU-1.2.A: Parking Utilization Study at DCPS Facilities:**
 - ANC1A wholeheartedly agrees that more must be done to address demand for parking at DCPS schools. However, we are not of the opinion that this proposed policy goes far enough. As part of any master facilities plan for DCPS sites, it is easy to determine that parking demand for faculty and staff at each and every facility. Rather than reduce open green space and recreational facilities to create surface parking lots, the District needs to invest in facility serving underground parking when appropriate. It has not gone unnoticed that an underground parking facility was constructed for Ward 3's Janney School, yet when Ward 4's Powell School was modernized a community garden was destroyed for a surface parking lot. Such inequitable practices that underinvest in less affluent communities must end, especially when the end result is less community open space for surface parking. In addition to improving parking at facilities, ANC1A requests that the transportation management plan provide for additional traffic improvements, such as sidewalks and bikeways, to promote safe routes to schools, and consider the ability of students to safely walk and bike to school when making decisions about future sites.
- **Policy EDU-4.1.2 CSF-2.2.2: Child Care Incentives Expanding Access to Child Development Facilities**
 - ANC1A strongly supports providing incentives for new and rehabilitated residential and commercial developments to set aside on-site space for child care development facilities. However, language is needed to support those child development facilities as participants of DC's Quality Rating and Improvement System and subsidy program to increase access to and build the supply of affordable, quality child care for families of all income levels. For example, such language can state the following "provide incentives for new and rehabilitated residential and commercial developments to set aside on-site space for child care development facilities, particularly those who are or will participate in the District of Columbia's subsidy program and Quality Rating and Improvement System."

Support

After careful review of the proposed changes to the Educational Facilities Element, ANC1A *Supports* the following proposed Policy and Action amendments:

- **Policy EDU-1.1.3: Co-Location of Charter and DCPS Schools:**
 - ANC1A strongly supports the inclusion of "needs for green open space and recreational facilities" in this policy. We have experienced first-hand the negative impact on the community when there is a failure to access the need for open space. A good example is the former Bruce School at 770 Kenyon Street, NW, where the charter school co-locating in the building repurposed its outdoor green open space as a surface parking lot, and then relied on neighboring community park space as its green open space for recreation. Such conflicts need to be considered, assessed, and solved during the initial planning process rather than later when conflicts in community priorities and goals arise.
- **Policy EDU-1.1.8: Expanded Access to Facilities for DCPS and Public Charter Schools**

- ANC1A strongly supports the idea of collaboration across and within sectors and encourages schools and other providers to co-locate in facilities and with programs in ways that will optimize service provision, intergenerational and intercultural use. An example of successful partnerships includes the previous co-location of Briya PCS for 30-year within Bancroft Elementary School. With both schools located in the same facility, the needs of students and families were addressed their partnership and provided families a rich, culturally sensitive learning environment that supported academic, social, and economic successes through on-site classes for parents coupled with a high-quality, early childhood program. Further, we believe co-location builds on and supports the furthering of **Policy EDU-2.1.1: Collaborative Arrangements with Community Service Providers** by sharing opportunities to access important partnerships with other District government, non-profit, and other institutions and the promotion of schools as a central focus of community activities.
- **Policy DCU-1.2.3: Developer Proffers for DCPS Facility Needs:**
 - We support the inclusion of this policy and encourage the Office of Planning to further develop documentation on appropriate types of developer proffers. We also suggest that significant proffers, such as renovation and modernization of school auditoriums, new roofs, or HVAC systems, be considered as desirable community benefit outcomes from the Planned Unit Development process.
- **Policy EDU-4.1 Child Development Facilities:**
 - After careful review of the proposed changes and new amendments to, ANC1A supports the text amendments and ANC1A suggested recommendations above and has no further suggested changes. These provisions encourage the expansion of affordable, high quality child care and investments that support a highly qualified early care and education workforce as the supply of infant and toddler care grows in the city.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, ANC 1A



Commissioner Christine Miller
Chair, ANC 1A Education Committee

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Certification:

After providing sufficient notice for and with a quorum of 11 present at its February 12, 2020, meeting, Advisory Neighborhood Commission 1A voted, with 11 Yeas, 0 Nos and 0 Abstentions, to adopt the above resolution.

ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Educational Facilities
Element

February 12, 2020

Page 5



Kent C. Boese
Chair, ANC 1A



Zach Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



ADVISORY NEIGHBORHOOD COMMISSION 1A

SMD 1A01 – Layla Bonnot
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SMD 1A03 – Zach Rybarczyk
SMD 1A06 – Angelica Castañon
SMD 1A09 – Michael Wray
SMD 1A12 – Jason Clock

February 12, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Arts & Culture Element

Dear Director Trueblood,

On the evening of February 12, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following positions, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Arts & Culture Element.

Comments

ANC1A offers the following general comments:

- **AC-2.2 Using Art to Express Cultural Heritage**
 - While there are several Policies and action items in this section, we feel that there is still much that needs to be considered. ANC1A agrees and supports efforts to inclusively and equitably draw upon each neighborhood's cultural heritage to inspire artistic expression that is about us – both in the past, now, and in years to come. To achieve this goal, it is important to support and provide opportunities for cultural expression marginalized in the past. It is equally important to recognize the richness of the cultural fabric of each neighborhood in its entirety. For example, in the Park View/Pleasant Plains/Lower Georgia Avenue corridor, the area has supported strong German-American, Jewish, Caribbean, and African-American communities since the founding of the District of Columbia. Each of these merit inclusion in its artistic expression. Added to this is the importance of Howard University – one of the oldest HBCUs – the accomplishments of prominent residents, and the rich history of GoGo on the corridor. For example, partnerships with HBCUs such as Howard University could also be included in Policy AC-4.2.43: Colleges and Universities. Collectively, the richness and diversity of this history and culture should provide a wealth of inspiration for plays, music, sculpture, and murals that are both culturally diverse and inclusive.
- **Policy AC.1.1.7: Performance and Events in Public Space and Facilities and AC.1-1-8: Using District-Owned Facilities**
 - The Commission strongly supports these policies and appreciates the inclusion of recreation centers and libraries as recognized public spaces that can and do support arts and cultural activities. The Commission also supports language in this section

recognizing neighborhood parks as several ANCs in Ward 1 often use neighborhood parks for movie nights and performance and art events to provide communities with rich cultural experiences as well as promote a safe, healthy space for fellowship and convening. We also appreciate that schools have long been recognized. However, it has been our experience to date that our District agencies and their policies can be and often are exclusionary. For example, schools in Ward 1 with purpose-built auditoriums such as the Park View School or Garnet-Patterson Middle School are not always available to the public for use during non-school hours and a clear process for reserving these spaces for performances does not appear to exist. Furthermore, arts and cultural uses for the greater community in schools, libraries, and recreation centers does not appear to be a high priority, if a priority at all, when these facilities are modernized or rebuilt. ANC1A recognizes that the changes in policy may be better addressed at the agency level rather than in the Comprehensive Plan, but felt compelled to take this opportunity to advocate for more inclusive and equitable use and access policies at this time to further the dialogue that is needed to achieve these goals.

- **Policies AC-1.1.9-AC-1.1.13**

- ANC1A appreciates and strongly supports these new policies and urges strongly language to not only encourage a diversity of spaces and development opportunities to expand cultural facilities, but also to support a diversity of artistic and cultural expression. Currently, the primary artform that is most prevalently supported by public policy is murals. Yet music, sculpture, lively arts, and digital art is equally important to our constituency. Therefore, it is our opinion that the outcome of any successful arts and cultural policies in the Comprehensive Plan will be a growth and diversity of all art forms in our community, not just an expansion of one.

- **Action AC-2.1.B: Small Parks for Public Art Assessment**

- The Commission strongly supports this action item, especially as we have observed that our small parks are often designed to be low maintenance or to prevent “undesirable” uses rather than designed to enhance community needs – resulting in underused spaces that don’t live up to their potential. Activating these spaces through good design that is inclusive of the arts will result in active community gathering spaces that are enjoyed both by those who spend time in them and those who may merely be passing by en route to their destinations.

- **AC-3 Arts and the Economy**

- ANC1A strongly supports new language in the Comp Plan that promotes Department of Small and Local Business Development (DSLBD) grants and technical assistance for aspiring and established local business owners, including cultural businesses. However, we recommend inserting “minority business enterprises” in this provision recognizing the contributions of minority business owners in arts and culture offering rich cultural experiences to communities and its dedication to murals and public art. DSLBD opportunities for MBEs could further enhance these activities.

- **Policy AC-3.3.3: Commemorative Works**

- The Commission appreciates the inclusion of this policy and urges the Office of Planning to develop a corresponding action item to support its fruition. We wholeheartedly agree that commemorative works should be located in every neighborhood across the District and not just in the Downtown core. ANC1A is aware of the Dominican Republic’s desire to place a statue in the District and would strongly support its placement on 14th Street

where it would be appreciated by many in our community. Ideally the vetting process for new commemorative works would include local representation – such as ANCs – to better identify sites where new commemorative works would have a meaningful connection to a neighborhood's constituency.

- **Policy AC-4.3.1: Incorporating Arts and Culture into Community Planning**

- Overall, the Commission supports this and recommends that an arts and culture component be a mandatory outcome of any Planned Unit Development. We recognize that housing is a top priority, but also recognize that these larger developments have a more significant impact on a neighborhood than just about any other development. Therefore, mandating recognition of significant events or influential former citizens near these developments also have an arts and cultural component that needs to be part of the outcome.

- **Policy AC-4.3.2: Emphasizing Community Identity Through Creative Placemaking and Policy AC-4.3.3: Partnerships to support Creative Placemaking**

- ANC1A strongly supports language included in the Comp plan that encourages Advisory Neighborhood Commissions (ANC) having a role in creative placemaking. However, ANCs are not “commercial management and revitalization organizations” deploying creative placemaking interventions as referenced in the Comp Plan. Similar language is also used in “AC-1.2 Art and Culture in Every Community” referencing ANCs as “placed-based organizations.” Describing ANCs in this manner is inaccurate and does not reflect the true role of an ANC. An ANC is a non-partisan, neighborhood body made up of locally elected representatives. Therefore, the Comp Plan can instead recognize ANCs as “active community partners” where DC government could provide notice to ANCs of funding opportunities for creative placemaking in neighborhoods and ANCs could advise on effective neighborhood engagement strategies involving residents and community-based organizations on arts and culture within the design of community development projects.

- **Policy AC-4.4.1: Arts and Cultural Education Programs**

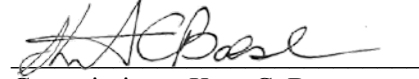
- ANC1A strongly supports language recognizing the importance of arts and cultural educational programs for persons of all ages and backgrounds in the Comp Plan. However, these programs must start earlier than preschool to support the kinds of rich and robust early learning experiences that prepare young children for success in school and lifelong learning. This includes recognizing early childhood programs that offer curriculum promoting engagement in music, movement and drama activities as well as visual arts. This aligns with the new arts standards within the 2019 District of Columbia's Common Core Early Learning Standards, which include new arts standards for young children from birth to pre-K. Recognizing arts and cultural educational programs in “early childhood settings for infants and toddlers” and inserting this language in this section also supports 1415.1 of the arts and culture element within the Comp Plan.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,

February 12, 2020

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Commissioner Kent C. Boese

Chair, Advisory Neighborhood Commission 1A

####

Certification:

After providing sufficient notice for and with a quorum of 11 present at its February 12, 2020, meeting, Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 11 Yeas 0 Nays 0 Abstentions



Kent C. Boese

Chairperson, ANC 1A



Zachary Rybarczyk

Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



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January 8, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Urban Design Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following recommendations and proposed amendments to the District of Columbia Comprehensive Plan's Urban Design Element.

Recommendations

After careful review and consideration, ANC1A ***Recommends*** that language be added to the Urban Design Element and all other relevant areas of the Comprehensive Plan addressing and incorporating the following issues and goals:

- **Parks & Reservations:** The Commission agrees with language in the draft that describes the “District’s public squares, circles, triangles, public ‘reservations’ [as being] undervalued and lack[ing] distinction.” **903.5.** ANC1A also supports the amendments and goals of *Policy UD-1.1.1, Policy UD-1.1.2, Policy UD-1.1.5, and UD-1.1.6* which will guide future development to restore closed streets, obstructed vistas, and other elements core to the District’s historic design and character and emphasize the importance of investing in parks and green spaces. However, we do not see a corresponding Action item related to public greenspaces and encourage the Office of Planning to consider adding an Action to this section to address them – particularly for smaller parks and reservations. As noted, many of these spaces are under designed, lack public amenities, and in some cases have been entirely concreted over. Efforts should be made to restore greenspaces, install public amenities such as benches, landscaping, drinking fountains, public fountains, public sculpture, and placemaking infrastructure such as neighborhood gateway signs and public clocks.
- **Action UD-1.1.A: Siting of Commemorative Works:** The Commission appreciates the changes to this Action and encourages OP to include stronger language to encourage locating commemorative works throughout the District and in every neighborhood. All residents should benefit equally from public art, and public art should be located in every neighborhood. At the local/neighborhood level, commemorative sculptures should commemorate events, subjects, and people that have strong connections to their sites and/or the surrounding community.

- **Policy UD-1.2.4, Action US-1.2.B, and Figure 9.7 – Panoramic views**

Upon reviewing the sections related to panoramic views, ANC1A agrees and supports efforts to identify, protect, and enhance important viewsheds in the District of Columbia. In reviewing Figure 9.7 we note that locations are missing from the map, and that the views identified are bias toward panoramas *of* Washington. While these are important, they are not the only views that should be considered. Therefore, we recommend that the following panorama views be considered for inclusion in Figure 9.7 and as part efforts to implement Action UD-1.2.B:

- Fort Stanton: The panoramic view from Ward 8's Fort Stanton is among the best in DC and offers visitors one of the best opportunities to understand the overall geography of the area;
- Fort Reno: Views west toward Virginia are impressive and provide a better understanding of the site's strategic importance during the Civil War; and,
- Palisades Recreation Center: The views over the Potomac allow visitors to appreciate the natural beauty of the river. As part of the site's development by the National Park Service in 1936, it was conceived of as a scenic overlook of the Potomac and corresponds with a similar overlook on the George Washington Memorial Parkway on the Virginia Side of the river.
- **Waterfront Access, Connectivity, and Barriers:** ANC1A supports Policy UD-1.3.7 and Action UD 1.4.C, which both address the damage freeways have caused in cutting off residents from waterfronts, public space, and each other. We applaud efforts to undo this damage and urge OP to also recognize that this is as much an issue of equity as the other issues identified in the draft text. In particular, the raised freeways of I695 and the Kenilworth Avenue Freeway (295) have created significant damage and barriers to the communities in which they were built. Those impacted most from the negative impacts have tended to be communities of color and lower income residents. The District should explore the potential of leveraging Federal highway funding to rebuild these roadways below grade so that significant sections can be decked over to create public parks and natural connections between neighborhoods and between residents and the waterfront. Margaret T. Hance Park in Phoenix, Arizona, is a successful example of a city decking over a freeway (Interstate 10) to create a large public park, maintain historic viewsheds, and construct needed roadway infrastructure. Lastly, we also note that the District should explore options to improve the Whitehurst Freeway (potentially removing) as well as deck over the freeway spaghetti that separates the Kennedy Center and Potomac River from the communities to the east.
- **Policy UD-1.3.5: River Views:** Access to river views for cyclists seems to be missing from this policy. We recommend that "bicycle infrastructure" be included in the following sentence: "Public river views on bridges and piers should be enhanced though lighting, seating, "bike infrastructure," and strong pedestrian connections."
- **Policy UD-2.1.3: Quality Transitions Between Modes of Transit:** We recommend adding "bike lanes, or travel lanes" to the last sentence, so that it reads: "Design access for delivery trucks, valets, and rideshare within the street and not at the expense of the pedestrian sidewalk, bike lanes, or travel lanes."
- **Policy UD-2.1.6: Minimize Mid-block Vehicular Curb Cuts:** We support and applaud the inclusion of this new policy in the Comprehensive Plan, but the language does not go far enough. ANC1A has successfully fought and prevented new curb cuts from being installed and have been working with DDOT to rethink the approval process of curb cuts. Every curb cut creates a traffic conflict between motor vehicles, pedestrians, and non-motorized transportation such as bicycles.

Historically, the standard for approving a curb cut has been one where the outcome “has no adverse impact” on the block. This is subjective. Instead, new curb cuts should be banned unless their creation can prove a clear benefit to the community – such as providing access to a significant amount of off-street parking for schools, government buildings, large housing developments, etc. Lastly, as the city changes, obsolete curb cuts need to be removed and the street scape restored.

- **Policy UD-2.2.1, Policy UD-2.2.2, and Action UD-2.2.B:** These policies and action item attempt to address neighborhood character, neighborhood architecture, and compatible design and materials for neighborhoods as they grow and change. ANC1A appreciates that OP is aware of these issues, but the language here is weak and offers little in guidance or strategy for successful growth in century old neighborhoods – particularly rowhouse communities which are extremely sensitive to incompatible changes in the built environment. We **URGE** OP to consider working with the Historic Preservation Office to develop neighborhood level design guidelines for every neighborhood, and especially for rowhouse neighborhoods. Such guidance should not only be available to residents who live in historic districts but should be equitably available to all residents who live in historic neighborhoods – whether officially recognized as “historic” or not. ANC1A would like to see OP pursue the following:
 - Develop design guidelines for every neighborhood. The guidelines should identify the architecturally important features for each neighborhood type that need to be preserved/retained;
 - Neighborhood design guidelines should also outline the elements of successful new development in historic neighborhoods. New, modern buildings can be successfully integrated into older neighborhoods through use of scale, materials, and architectural vocabulary. OP and HPO should proactively identify these elements for each neighborhood;
 - OP and HPO must have a functioning, independent Design Review Board that reviews all significant architectural changes as part of the Zoning and BZA process. While OP currently has a design review process, this does not include HPO staff as a regular part of the process and the result is that OP staff reports to the BZA often and frequently miss important details in their recommendations due to lack of experience; and,
 - As much as possible, original facades should be preserved and – when part of larger redevelopment efforts – be incorporated into new construction. Many examples exist whereby original facades in good condition have been needlessly destroyed to make way for new development – and where the replacement of the façade has achieved no real benefit to the overall development with regards to density or use.
- **Policy UD-2.2.8: Large Scale Development:** As this policy encourages the preservation/conservation of historic facades and values the character of older buildings, ANC1A further recommends that development that preserves original facades be granted bonus density to offset costs associated with preservation efforts.
- **Play Everywhere:** We appreciate and support the new policies UD-2.3.1-UD-2.3.4, however we are disappointed that there are no real action items to implement these policies. This is especially true with public squares, plazas, and any park that has no onsite management. In ANC1A, much of our experience related to public space has been informed by the Columbia Heights Civic Plaza and the park at 14th and Girard streets, NW. Both sites are heavily used and unmanaged. As such, both sites are poorly maintained resulting in broken fountains, broken and missing pavers, broken restrooms, and gathering places for resident suffering from addiction and homelessness – where

inadequate services further lead to their suffering. The Comprehensive plan must speak to these issues in addition to the policies put forward in this section.

- **Policy UD-3.1.4: A City of Markets:** We agree that public space is a great opportunity for temporary markets and vending. Yet, the Commission feels that two action items need to be included to address vendor needs that are not currently being met. These are:
 - Leverage vacant spaces for winter markets: Columbia Heights has an active and successful farmers market, but it does not operate in the winter. Yet across the street at DC USA there are commercial spaces that have never been activated. It would be wonderful if these spaces could support seasonal winter markets. To incentivize property owners to open their vacant spaces for winter markets, they could be rewarded with a lower tax rate per sq. ft. applied to the space used for the duration of the market.
 - Street vending: We have many street vendors in ANC1A, many from the immigrant community, who rely on selling street food to make a living. Yet there is presently no path by which they can apply for or receive permits to do this legally resulting in police officers fining and arresting those who are vending. We need a clear, accessible process for street vendors in the District.
- **Policy UD-3.2.4: Safe and Active Streets:** We feel there is more that should be considered as part of this policy. In addition to active building frontages and adequate lighting, blocks with narrow streets and sidewalks should also be considered for review and reconstruction. Some streets may be candidates for closure to vehicular traffic in favor of pedestrian and bicycle uses. Others may function better by the removal of on-street parking in favor of bike lanes, better lighting, and increasing tree canopy. In short, streets that have histories of problems need to be reviewed and rethought so that we can improve safety and service to the community.
- **Action UD-3.3.B: Transfer of NPS Triangle parks to the District:** ANC1A is confused by this new action. Based on conversations that ANC1A has had with the National Park Service over the years, this action is unnecessary. Many of the small, triangle parks still owned by NPS have already been transferred administratively to the District government for management. While DC historically has taken this to mean mowing the grass and planting trees, the District currently has the authority to install walking paths, park benches, chess tables, sculpture, or any other improvement that enhances the park. Ownership of the land is not necessary for the District to enliven these parks now. NPS retained ownership of these parks to ensure that they would continue to be used, maintained, and improved as public parks. If this is the goal of this action, then ownership is not needed. If, however, the goal is to eventually develop these properties for uses other than recreation, then ANC1A is strongly opposed.
- **Policy UD-4.2.3: Continuity and Consistency of Building Frontages:** ANC1A supports this new policy and is encouraged by it. However, we don't see a corresponding Action item which is needed. As Action UD-2.4.A clearly states that DC is for people, we note that where people are often overlooked is the impact of new development on sidewalks. Streets like Georgia Avenue are too narrow to accommodate sidewalk cafes and have older facades that create choke points by extending past adjacent buildings and the prevailing facades. ANC1A recommends that OP better identify the major areas where street activation is desired and recommend the adjustment or creation of building restriction lines that will help create the public spaces needed to be community serving. In instances where this will have a significant impact on future ground floor development, we also urge OP to provide clear guidance that upper floors can be cantilevered out from the building and cross the building restriction line so that the air rights above are not impacted by building restriction lines on commercial corridors.

- **Action UD-4.3.A: DC Urban Design Guide:** We wholeheartedly support the creation of an “Urban Design Guide” for the District of Columbia that compiles existing codes and regulations. We further recommend that this is an opportunity to build upon and incorporate best practices from other jurisdictions and from national organizations such as the National Association of City Transportation Officials, which has published a number of guides.

Support

After careful review of the proposed changes to the Urban Design Element, ANC1A ***Supports*** the following proposed Policy and Action amendments:

- **Action UD-1.1.B: Review of “Public Parking” Regulations**

ANC1A strongly supports this action item. Due to the confusion between the term “public parking” and the concept of parking vehicles in public space, there are a lot of misperceptions to what public parking is and how it can be used. As part of a review of public space regulations and standards related to public parking, there needs to be clear guidance, outreach, and enforcement for property owners who park vehicles on sidewalks that are in the public parking. Past efforts in working with DDOT have resulted in no corrective actions due to a lack of clear policy and ownership of enforcement. Lastly in addition to design standards for “public parking” areas that address curbs, fences, and retaining walls, additional efforts should be considered to restore public parking that has been lost over the years as well as considering ways to leverage public parking to increase the District’s tree canopy, especially in neighborhoods where street tree boxes do not currently exist.

- **Action UD- 2.1.D: Public Restrooms in Streetscapes:** The availability of public restroom facilities is important to ANC1A, and we request that OP go one step further by thinking more broadly about restroom access. In addition to stand-alone restrooms in public space, we should also encourage them as part of neighborhood welcome centers and when activating vacant spaces for supportive services or for public markets. Additionally, it would be helpful if OP could create a map of each area where public restrooms are needed most. Ward 1 locations that come to mind are the areas of 14th & U streets, NW and 14th St. & Park Rd., NW. Both are active centers of community life, where the need for restrooms are evident.
- **Action UD-3.1.G: Reduce Barriers to Permitting of Public Space:** We support this action item and recommend that events that are free, inclusive, and community serving should have permitting fees waived with Advisory Neighborhood Commission support.
- **Policy UD-3.3.2: Small Parks for Recreation:** We have a number of smaller parks within our commission area that are under designed and underserving. We support this policy goal to better activate these parks.
- **Policy UD-4.2.4: Creating Engaging Facades:** We support this new policy and agree that new development can be harmonious within its neighborhood context when materials and architectural elements reference the existing neighborhood fabric. That said, we do not encourage all new buildings to be traditional, derivative, and boring. We do encourage innovation and architecture that is of its time. We ask OP to additionally consider the appropriateness of interactive elements, video art, or music/sound as other ways buildings and facades can be engaging. A good example of video art is at 1800 K Street, NW, where a digital banner connects the business signs and includes an ever-changing video of people walking. The art is colorful with changing backgrounds. Similar installations with different themes could be successfully incorporated on Georgia Avenue or 14th Street, provided they are video art and not electronic billboards.

- **Policy UD-4.3.4: Rooftop Penthouses:** ANC1A agrees with this policy.
- **Action UD-4.3.C: Review Zoning Height Restrictions:** ANC1A generally supports this new action and looks forward to being an engaged participant in that review to ensure that changes to zoning continue to be neighborhood serving, thoughtful, and overall beneficial to our constituents.

Opposed

After careful review of the proposed changes to the Urban Design Element, ANC1A ***Opposes*** the removal of the following Action item:

- **Action UD-2.2.C: Conservation Districts:** We are deeply disturbed by the recommendation to remove this Action item. Speculative development in historic neighborhoods that are not recognized historic districts has diminished the city's beauty, removed tree canopy, and resulted in housing constructed of lower quality and standards. Overall, this reduces the quality of life for every District resident, and especially those of lower incomes who do not have the means to relocate when their community is destroyed. Looking through an equity lens, Conservation Districts would have been a tool to manage similar neighborhoods in similar ways, while providing opportunities for growth and more housing. We strongly urge OP to either keep this element in the Comprehensive Plan or develop new methods of protecting every neighborhood's architectural heritage and quality of life for all residents.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

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Certification:

After providing sufficient notice for and with a quorum of 9 present at its January, 8, 2020, meeting, Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 9 Yeas 0 Nays 0 Abstentions

January 8, 2020

Page 7



Kent C. Boese

Chairperson, ANC 1A



Zachary Rybarczyk

Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



ADVISORY NEIGHBORHOOD COMMISSION 1A

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January 8, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Rock Creek East Area Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following positions, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Rock Creek East Area Element.

Opposition

After careful review and consideration, ANC1A is **Opposed** to the updated versions of the following Policies:

- **Policy-2.5.1 RCE: AFRH Redevelopment**

Most significantly, ANC1A strongly objects to the removal of the following language:

“It is critical that the western edge of the site near the Park View, Pleasant Plains, Petworth, and University Heights areas be retained as open space, with public access restored as it was when these neighborhoods were initially developed”

The removal of this language is unnecessary, as its inclusion aligns and supports language in Policy-2.5.4: Open Space at AFRH. Having these two Policies support each other strengthens the long-term goal of establishing publicly accessible open space for neighborhoods well documented as lacking adequate and equitable parks and greenspaces enjoyed by wealthier neighborhoods.

Ward 1's Park View and Pleasant Plains, in particular, have historic relationships to the once-open AFRH grounds and McMillan park. As such, each neighborhood was developed without establishing adequate public parks, plazas, and recreation areas necessary for healthy communities.

ANC1A is supportive of – or at least has not objected to – AFRH's plan to develop the 80 acres abutting Irving Street and North Capitol Street into a mixed use, mixed income community. Additionally, ANC1A is aware of the District's efforts to redevelop the former McMillan Sand Filtration Site. The added opportunities that the density, housing, and office space – as well as the expected

impacts on local traffic and infrastructure – that both developments will have on the area generally and the nearby Mid City neighborhoods specifically make it all the more pressing that public park and recreation space be guaranteed in the District's long-term vision for this area in the Comprehensive Plan. More residents will require more public space, not less.

Lastly, by leveraging both the AFRH and the McMillan Reservoir sites to restore and open up historic park space to the greater community, it will reduce the need to set aside significant parcels for park space along commercial corridors like Georgia Avenue which are zoned for more density and commerce – locations where the District can maximize its efforts to achieve its housing goals.

- **Policy RCE-2.5.3: Resource Protection**

The revised language of this policy waters down the value of the exceptional, historic, and rare panoramic views available from the high ground of the AFRH.

ANC1A recognizes and values these panoramic views and the historic resources that exist at the AFRH. This is especially true from Scott Circle Drive, where the statue of General Winfield Scott gazes out toward the Capitol Dome and Virginia beyond. Every effort must be made to protect and preserve the very views that helped inspire President Lincoln to continue the fight to preserve the Union and to write the Emancipation Proclamation. This can be accomplished with minimal impact on development and growth both on other sections of the AFRH as well as in the surrounding neighborhoods.

Support

After careful review of the proposed changes to the Rock Creek East Area Element, ANC1A ***Supports*** the following proposed Policy and Action amendments:

- **Policy RCE-1.2.2: Historic Resources**

ANC1A strongly supports identifying and increasing awareness of the District's historic resources. Every effort should be made to identify our historic resources, incorporate these resources as part of our growing and changing city, and ensuring that the significance of these resources are well known.

- **Action RCE-2.5.B: Irving Street Hospital Campus Strategic North Capitol Crossroads Planning**

ANC1A supports the rewrite of this action item, and the inclusion of the language “large site redevelopments contribute to a coordinated plan that leverages the opportunity to improve multi-modal mobility, open up publicly accessible green space, convert historic assets into new amenities, and provide new housing options to meet DC's growing demand”

Mixed Support

After careful review of the proposed changes to the Rock Creek East Area Element, ANC1A offers the following comments on an amendment where ***Support is Mixed***:

- **Policy RCE-2.5.4: Open Space at AFRH**

ANC1A Support is mixed on this policy. While we strongly support the added language “Design and plan for open space at AFRH to be more accessible as a local and regional public amenity for its

natural setting, historical and cultural importance, and recreational offerings”, we **do not** support the removal of the language “connection extending from this site south through the Irving Street Hospital Campus and McMillan Reservoir Sand Filtration site to LeDroit Park should be pursued.” Future park space at the AFRH could easily be connected to McMillan Reservoir and LeDroit Park via the DDOT Right-of-Way to the west of the Washington Hospital Center. While this would not be a linear connection, it can be accomplished as part of DDOT’s Crosstown Multimodal efforts and achieved with minimal impact on overall development or a loss to the District’s housing opportunities and goals.

Recommendations

Finally, after careful review and consideration, ANC1A **Recommends** that language be added to the Rock Creek East Area Element to address the following issues:

- ANC1A Recommends that an Action item be added as part of RCE-2.2.1 for a Small Area Plan around the Georgia Avenue Metro Station to increase density on two areas abutting the station. Language should be added to achieve consistency with ANC1A’s recommendations in our FLUM recommendations, namely:
 - Square 2897, Lots 54-56, 145, & 147: Change use from Moderate Density Commercial, Medium Density Residential to Medium Density Commercial, High Density Residential. This property is at the transportation hub of the Georgia Avenue Metro Station and is well served by several WMATA bus routes. It is a sensible place for higher density development.
 - Square 3029: Change use from Moderate Density Commercial, Medium Density Residential to Medium Density Commercial, High Density Residential. This property is at the transportation hub of the Georgia Avenue Metro Station and is well served by several WMATA bus routes. It is a sensible place for higher density development.
- ANC1A Recommends **Action RCE-2.2.D: Georgia and New Hampshire Avenue Intersection** not be considered as completed. While the Commission recognizes that much has been completed at this intersection, it still does not function as desired. The Action item states that the goal is for “crosswalk improvements and other changes to create a more desirable shopping district and favorable climate for new investment.” While the crosswalks and overall area is more aesthetically pleasing, the overall design improvements still have not achieved the most important goal of this action, that being to “Enhance pedestrian safety” or the creation of “a more desirable shopping district.” For these reasons, ANC1A recognizes the efforts that have already been undertaken, but recommends that this section be updated to recognize the important work remaining that must be undertaken to achieve the stated goals.
- Lastly, ANC1A **recommends** that the remnants of Tiber Creek still existing on the AFRH be recognized for both their historic and ecological importance to the District and our environment. This small naturalized Tiber Creek area near the intersection of Irving/Kenyon Street and Park Place should be protected and preserved as part of any long-term Land Use Plan.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Rock Creek East Area
Element

January 8, 2020

Page 4

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

Certification:

After providing sufficient notice for and with a quorum of 9 present at its January, 8, 2020, meeting,
Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 9 Yeas 0
Nays 0 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



ADVISORY NEIGHBORHOOD COMMISSION 1A

SMD 1A01 – Layla Bonnot
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SMD 1A06 – Angelica Castañon
SMD 1A09 – Michael Wray
SMD 1A12 – Jason Clock

January 8, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Parks, Recreation, & Open Space Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following recommendations and proposed amendments to the District of Columbia Comprehensive Plan's Parks, Recreation, & Open Space Element.

After careful review and consideration, ANC1A ***Recommends*** that language be added to the Parks, Recreation, & Open Space element, the Land Use element, sections related to Planned Unit Developments, and all other relevant areas of the Comprehensive Plan allowing for bonus density and zoning flexibility for projects that set aside space for the creation and management of new parks, plazas, and public serving spaces.

The communities represented by ANC1A are underserved by public space in general, and well managed quality public space especially. ANC1A recognizes and supports the creation of new housing affordable to families of all incomes and understands that many planning priorities in our community may be competing for the same space when opportunities become available.

Historically, the District of Columbia does not have a great record of leveraging air rights to achieve housing and development priorities – though recent efforts over Interstate 395 and at Union Station illustrate that this is changing.

In District of Columbia neighborhoods – especially those that are densely populated and largely built out – we need to find creative solutions for new development in order to increase public open space AND housing goals. ANC1A is of the opinion that any new development (public or private) that sets aside space for public purposes should receive zoning flexibility for additional height or incentivized to use its air rights at upper stories of the project. Such a policy rewards public-serving development and reduces conflict among the Comprehensive Plan's priorities. The Park Morton Build-first site is an example of where ANC1A worked with DMPED to balance the need for housing and park space, with the result being a taller building that allows for the creation of a 1-acre permanent community park.

After careful review of the proposed changes to the Parks, Recreation, & Open Space Element, ANC1A ***Supports*** the following proposed Policy amendments:

- Policy PROS-1.2.1: Closing the Gaps

Achieve a better distribution of high-quality parks in all neighborhoods of the city. Provide access to the natural environment or quality green space within a 10-minute walk of all residents. This will require a priority on improving or expanding parks in: (a) more densely populated neighborhoods with limited open space; (b) areas that are more than ½ mile from a neighborhood or community park (or a federal park that serves an equivalent function); (c) areas where substantial new housing growth is expected, based on the forecasts of the Comprehensive Plan; and (d) areas where the existing recreation centers and parks are in poor condition; and (e) areas where social and economic conditions compel a greater investment in parks to improve health, public safety, and community well-being;

- Policy PROS-1.2.3: Responding To Community Change

Update and improve existing parks in response to changing demographics, cultural norms, and community needs and preferences. Parks should reflect the identity and needs of the communities they serve. Further, the parks and recreation system should evolve to offer a variety of facilities located within a reasonable distance of each resident and provide a range of programs in spaces designed to flex as residents' needs and interests change;

- Policy PROS-1.4.1 Park Planning

Prioritize the creation of parks and recreation spaces through neighborhood planning and development review processes, particularly in areas where residents are not within a 10-minute walk of sufficient park space;

- Policy PROS-1.4.23: Acquisition Methods

Use a variety of methods to acquire and improve parkland, including easements, donations, land purchases, strategic property transfers, long-term land leases, and park set-asides on new development sites. Recognize the impacts of new development on the need for additional park and recreational facilities, and mitigate impacts through dedication of parkland or in-lieu payments;

- Policy PROS-2.1.3: Quality and Compatible Design

Require all park improvements to be of high design and construction quality, sensitive to the natural environment, respectful of historic structures and important cultural landscapes, sensitive to accommodating people of all abilities, and compatible with surrounding land uses;

- Policy PROS 3.3.5 Boulevards and Parkways

Balance the transportation needs and safety standards of modern roadways with the resource protection and preservation goals of scenic parkways to minimize impacts on viewsheds and natural and cultural resources that comprise the parkway landscape;

- Policy PROS-3.3.6: Enlivening Cemeteries

Explore using cemeteries for passive open space. Collaborate with cemetery administrators to reconnect the burial grounds to the surrounding neighborhoods for greater public access; and,

- Policy PROS-4.3.2: Plazas in Commercial Districts

Encourage the development of high-quality, multifunctional, and publicly accessible outdoor plazas around Metro station entrances, in neighborhood business districts, around civic buildings, and in other areas with high volumes of pedestrian activity. Design plazas to be reflective of neighborhood preferences, to serve as gathering spaces, and to function as green infrastructure. Use the planned unit development process to promote such spaces for public benefit and to

encourage tree planting, public art, sculpture, seating areas, and other amenities within such spaces.

After careful review of the proposed changes to the Parks, Recreation, & Open Space Element, ANC1A ***Supports*** the following proposed Action amendments:

- Action PROS-1.1.D: Quality of Existing Park Spaces
Develop an enhanced maintenance and improvement schedule to upgrade the quality of passive and active parklands and outdoor facilities to make the most of existing District park;
- Action PROS-1.2.C: Park Spaces on District Properties
Encourage shared use agreements for green spaces owned by District government and DC Public Schools (DCPS) so that these areas are available and accessible to residents for recreation purposes;
- Action PROS-1.3.E: Coordination of Maintenance and Programming Responsibilities Improve the coordination, scheduling, and management of park and open space maintenance and programming responsibilities among relevant government agencies, including the DPR, DGS, NPS, DCPS, DDOT, the Department of Public Works (DPW), and the Department of the Environment (DOEE). Consider the establishment of Districtwide maintenance standards and cost estimates;
- Action PROS-1.4.A: New Parkland or Park Dedication Impact Fee
Study a requirement for a dedication of new parkland – or a park impact fee in lieu of new parkland creation - for new development or redevelopment. The amount of new parkland required - or fee in lieu of new parkland creation - should be based on the size, use, and density of the new development;
- Action PROS 2.1.C: Parks Restroom Inventory
Conduct an assessment of the existing parks restroom inventory, considering park size and usage to determine the needs for additional public restrooms;
- Action PROS-2.1.E: Improvement of Outdoor Recreational Facilities Systematically evaluate existing outdoor recreational facilities based on Park Master Plan design guidelines. Implement plans to eliminate deficiencies and close gaps through capital improvements. Typical capital projects might include turf restoration, addition of lighting and seating at sports fields, playground renovation, and resurfacing of basketball and tennis courts;
- Action PROS-2.2.G Design Standards
Create District-wide parks and recreation facility design standards for outdoor facilities. Design parks, open spaces, and recreational facilities to reflect the resident preferences and culture of the local population, to accommodate a range of age groups and abilities, and to improve the safety of visitors and staff. When renovating playgrounds and parks, design new infrastructure for active recreation, including workout equipment, for all ages and abilities;
- Action PROS-3.1.F: Park Land Transfers
In cooperation with appropriate federal agencies, identify park resources in federal ownership that could potentially be transferred to the District for conservation or recreation purposes only, such as Franklin Park, RFK stadium, and Langston Golf Course; and,
- Action PROS 3.3.B Boulevards and Parkways
Protect and maintain boulevards and parkways as elements of the larger park and open space system. Ensure that proposed improvements and maintenance projects along trails and parkways minimize impacts on viewsheds and are sensitive to their natural and historic qualities that make them significant.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

Certification:

After providing sufficient notice for and with a quorum of 9 present at its January, 8, 2020, meeting, Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 9 Yeas 0 Nays 0 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



ADVISORY NEIGHBORHOOD COMMISSION 1A

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SMD 1A09 – Michael Wray
SMD 1A12 – Jason Clock

January 8, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Land Use Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following recommendations and proposed amendments to the District of Columbia Comprehensive Plan's Infrastructure Element.

After careful review and consideration, ANC1A **Recommends** that language be added to the Land Use Element and all other relevant areas of the Comprehensive Plan addressing and incorporating the following issues and goals for Transit Oriented Development and Planned Unit Developments:

- **TOD Boundaries:** ANC1A supports the inclusion of "landmark status" in Policy LU-1.3.7 "Policy LU-1.3.7: TOD Boundaries", but **recommends** that the final sentence be rewritten to include non-landmark buildings that are eligible for landmark status. To balance the competing needs of preservation and development at TOD's, ANC1A further recommends that where historic structures exist near TOD, especially near Metrorail stations, that bonus density be allowed and encouraged for non-historic structures/districts along transit corridors and near Metrorail. Allowing for bonus density under these conditions helps balance the competing needs of development and preservation in a positive way where these priorities ultimately complement each other without one diminishing the other; and,
- **Planned Unit Developments:** ANC1A Supports the amended text for Policy LU-2.1.14: Planned Unit Developments in Neighborhood Commercial Corridors. The Commission further **recommends** that OP consider adding text that states that when PUDs incorporate historic facades or dedicate a portion of their property to public use – such as a public park or plaza – that the PUD receive the maximum allowable density or zoning flexibility. Such an example occurred with the former Bruce Monroe site. In this example, the Park Morton build-first development was designed to be taller with the trade-off being a new, permanent community serving 1-acre park. Had the development been reduced in height, it would have been at the expense of a public park which is greatly needed in the community.

After careful review of the Office of Planning's proposed changes to the Land Use Element, ANC1A strongly **Supports** the following proposed Policy amendments and Action amendments with additional comments as warranted:

- **Policy LU-1.1.8 Reconnecting the City through Air Rights and Action LU-1.1.C: Development of Air Rights**

While ANC1A strongly supports the language leveraging air rights in the District, we are of the opinion that air rights is a useful tool in District neighborhoods as well as in the city's core. Air rights can also produce additional housing and neighborhood serving commercial space on small parcels as well as large. We encourage OP to think about air rights more broadly as a city-wide effort that considers development in three dimensions in every neighborhood context;

- **Action LU-1.2.A: Federal Land Transfer**

ANC1A strongly supports the inclusion of "long-term leases" in the language for this amendment;

- **Policy LU-1.3.3a: Affordable Rental and For-Sale Multifamily Housing Near Metrorail Stations**

ANC1A supports District efforts to ensure that housing near Metro stations is affordable to residents of all income levels. It has not gone unnoticed by the Commission that property near Metro stations comes at a premium, making it unaffordable to many. Yet these locations are ideal for lower income households exactly because they are well served by rail and bus. Increasing housing affordability near Metro stations has the added benefit of reducing overall reliance of individual car ownership as well.

- **Policy LU-1.3.5: Development Along Corridors**

ANC1A is well served by two major commercial corridors – 14th Street and Georgia Avenue – and supports language aimed at encouraging growth and development along these corridors. We noted the inclusion of language to "ensure that development adjacent to Metrorail stations in planned and designed to respect the character, scale, and integrity of adjacent neighborhoods", but also note the absence of any reference to protecting historic resources near Metro stations. ANC1A *recommends inclusion* of language that states that both recognized and eligible historic resources must be respected in these development corridors. There are well known examples of Metro stations having been constructed and being in close proximity to historic structures;

- **Action LU-1.3.A: Station Area and Corridor Planning**

ANC1A strongly supports this action item and notes that a detailed station and corridor plan is urgently needed at the Georgia Avenue Metro Station; and,

- **Action LU-1.3.C: Metro Station and Inclusionary Zoning**

ANC1A is particularly supportive of the language recommending "appropriate bonus density and height allowances" near Metro Stations. Please refer to our Recommendations to the FLUM, where we *recommend* that OP consider increasing the density allowed for parcels in Squares 3052, 3038, 2897, & 2039. Increasing the density on these parcels will not have a negative impact on the neighborhood's character. On the contrary, they will help the community achieve its full potential and will result in additional housing and retail spaces;

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

January 8, 2020

Page 3

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

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Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
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January 8, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Infrastructure Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following recommendations and proposed amendments to the District of Columbia Comprehensive Plan's Infrastructure Element.

After careful review and consideration, ANC1A ***Recommends*** that language be added to the Infrastructure Element and all other relevant areas of the Comprehensive Plan addressing and incorporating the following issues and goals:

- **Cemetery Infrastructure**: Contrary to popular perception, cemeteries contain a significant amount of impervious surface area, which contributes to stormwater runoff. While cemeteries are not exempt from the impervious surface tax, as non-profit entities they generally neither have funds to absorb the tax nor have funding to incorporate bioretention areas and the infrastructure improvements needed to mitigate stormwater runoff. A goal of the District needs to be to partner with cemeteries to upgrade their infrastructure so that it supports the District's sustainability and environmental goals. Strategies could include grants (similar to façade improvement grants for small businesses) or tax incentives for cemeteries to actively upgrading their infrastructure;
- **Intelligent Traffic Control System**: The District of Columbia currently has an antiquated and labor-intensive traffic control system. Traffic Signal timing is not centrally controlled and can only be adjusted by crews making adjustments to the equipment on site. Intelligent transportation systems (ITS) apply communications and information technology to provide solutions to congestion as well as other traffic control issues. ITS information ranges from real-time traffic conditions to sensors for weather conditions to toll booth information. Things like variable message signs can warn of Amber Alerts, accidents, speed limit changes or delays. ITS controls the flow of traffic via traffic signals, or by opening and closing special lanes based on traffic conditions. Video surveillance cameras are also a big part of the ITS infrastructure, adding to the network bandwidth demands. Installation of an ITS in the District is necessary to achieve optimal traffic flows and efficiency;
- **LED Streetlights**: As the District transitions away from incandescent streetlights to LED bulbs, language should be included in the Comprehensive Plan addressing the relationship between

lighting and public health. Due to lighting's impact on public health, ANC1A advocated for DDOT to use newer LED technology, in particular LED 3,000 kelvin bulbs on interstates and major and medium arterial roads and 2,700 kelvin bulbs in residential areas. We are pleased that DDOT adopted this recommendation. The link between public health and infrastructure needs stronger language in the Comprehensive Plan for guidance as newer technologies arise;

- Solid Waste Transfer Stations: More thought is needed regarding solid waste transfer stations, and language needs to be included that the District will work with our *regional partners*. The District currently has two solid waste transfer stations, and ANC1A agrees that this service is a necessary part of the city's trash management service. However, the Comprehensive Plan is silent on how solid trash management is handled in the metropolitan area, the responsibility of our regional partners, and if the District's facilities are managing solid waste from other jurisdictions. Solid waste trash management is a metropolitan-wide need, and the services and infrastructure within the District must be a equitable part of the overall system;
- Ban Surface Parking Lots in Favor of Small Localized Parking Facilities when Practical: While constructing parking facilities may not be among the District's highest priorities, a review of DCPS school capital projects over the past 10+ years demonstrates that there are times when investing in small scale underground parking facilities is the right thing to do. The examples that most directly come to mind are Tubman Elementary School and Powell Elementary School. Both are located in dense rowhouse neighborhoods where on street parking is in high demand. In many cases due to the high cost of living in the District, a significant number of teachers who teach in our schools drive from outside the school's neighborhood. At Tubman ES, teachers currently park in a small lot on the north of the building and on the edges of the athletic field. The field is large enough to accommodate parking facilities beneath it. At Powell ES a school modernization project expanded the school and the need for teacher parking. Rather than invest in underground parking facilities for Powell, the District destroyed half of DPR's Twin Oaks community garden and installed a surface parking lot. Whether the District invests in building underground parking facilities or not, as a matter of policy the District should be reducing land devoted to surface parking lots and banning construction of new ones.; and,
- Cross-Systems Integration: Distribution Networks Gas Stations: The current amendments note that standalone gas stations are an important distribution network which provides energy supply to District Resident's. The language in this section needs to be stronger and provide a vision for the future of gas station sites. Currently, they provide energy primarily in the form of petroleum products. As newer technologies emerge, gas stations need to evolve into centers that provide District residents with energy options beyond petroleum. In addition to petroleum, they need to begin providing charging stations for electric vehicles and be flexible to adapt to the changing demand for a diversity of energy types in the future.

After careful review of the Office of Planning's proposed changes to the Infrastructure Element, ANC1A strongly ***Supports*** all the newly proposed Policy amendments and Action amendments with the exceptions of the areas outlined above, where more attention is needed.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

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Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
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January 8, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Environmental Protection Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following positions, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Environmental Protection Element.

Overall, ANC1A is excited and supportive of new language that more strongly supports solar energy, carbon neutrality, and reducing motor vehicle emissions. We also support new language addressing the impact of climate change and associated impacts such as flooding.

Recommendations and Comments

After careful review and consideration, ANC1A ***Recommends*** that language be added to the Environmental Protection Element to address the following concerns:

- Bird Friendly Design Standards: In reviewing this element, language is completely absent with regards to building design's impact on birds. The only reference we could identify in the current draft is the impact of lighting on migratory bird patterns. This is a significant oversight, as building heights and materials have also been proven to have a direct relationship with birds striking buildings resulting in their injury or death. As Washington DC grows in population and builds denser neighborhoods, ANC1A strongly urges the Office of Planning to include a Policy and/or Action to include the LEED Pilot Credit #55 – Reducing Bird Collisions as a city-wide standard for new construction seeking LEED certification.
- Tiber Creek Protection and Restoration: Tiber Creek is an important and historic District waterway. Over the years, much of it has been undergrounded or destroyed. Yet a small, naturalized section still exists on the AFRH grounds near the intersection of Park Place and Kenyon Street, NW. The importance of this natural resource needs to be recognized, protected, and restored as practically as possible – including the natural seeps along Rock Creek Church Road, which flow into the two ponds on the AFRH grounds and then south through the existing section of Tiber Creek. Furthermore, any reworking of DDOT's highway right-of-way to the south of AFRH and north of McMillan Reservoir should potentially include efforts to daylight,

restore, and naturalize any section of Tiber Creek that is in that area. Not only is this an important natural waterway, but waterways such as this help reduce stormwater runoff, support wildlife, and are valuable resources for pollinators. In particular, language regarding Tiber Creek should be included in the following Policies and Actions:

- o Policy areas E-2.2.1-E2.2.5 as appropriate and Policy E-2.4.4.
 - o Consider a new action item Action E-2.2.E with the goal of protecting, restoring, and daylighting Tiber Creek where possible.
- **Banning Surface Parking Lots:** While ANC1A has recommended this action in other elements, it seems appropriate to request that it be added in the Environmental Protection Element as well. A city like the District of Columbia must have the goal of banning new surface parking lot and reducing or eliminating existing surface parking lots in the future. For an environmentally healthy and equitable city, when parking facilities are necessary, they need to be constructed underground or as part of a larger development. A case in point is the recent renovation and modernization of Powell Elementary School on Upshur Street. While there was enough land to construct underground school parking as part of Powell's new addition, instead the District destroyed half of a community garden for a surface parking lot. Such outcomes are contrary to the goals of the Comprehensive Plan, and do not make us a better city in the future.
- **Policy E.5.3.1 Interior Noise Standards and Policy E-5.3.3 Household Noise Control:** While ANC1A appreciates these policies, we are disappointed that their texts have not been updated from the current Comprehensive Plan language. While ensuring that new construction complies with federal noise standards and guidelines is laudable, and we understand the value of enforcement, it has been ANC1A's experience that these standards and efforts are too low to ensure spaces above bars and restaurants are livable in new mixed-use construction. These Policies and related Actions need to better define improved standards for shared walls and floors between habitable space and commercial space. The current standards, guidelines, and building codes are inadequate to meet the District's current and future needs for increasing density and housing in mixed use development.
- **ANC1A is extremely excited and support of Policy E-2.5.7: Meadow Habitats, which states:**
Create meadow habitat by converting large, contiguous, mowed areas to native meadow and/or shrub habitat when feasible. Reduce mowed grassy areas in road and highway rights-of-way and on District-owned property by converting those areas to meadows with native plants and small trees. The design of these areas should balance habitat enhancement with public safety, including vehicle and pedestrian sightlines
We ***urge the Office of Planning to include language*** related to the potential future use of the AFRH areas abutting Park View as an ideal candidate for creating meadow habitat as part of a larger effort to increase public greenspaces and environmental habitats.

Support

After careful review of the proposed changes to the Environmental Protection Element, ANC1A ***Supports*** the following proposed **Policy and Action amendments**:

- **Policy E-1.1.2: Urban Heat Island Mitigation and Action:-1.1.J: Resiliency Incentives**
ANC1A strongly supports the inclusion of these amendments. Neighborhoods, like Park View, currently exist in tree deserts and are incredibly hot in the summer months. This has a direct impact on the neighborhood's livability, with the greatest impact in our Commission area being on lower

income families, seniors, and families of color. We wholeheartedly support efforts to address this inequity and support efforts to construct green infrastructure and increase the tree canopy in neighborhoods like Park View;

- **Policy E-1.1.5: Resilient Infrastructure & Action E-1.1.A: Update Zoning for Resilience**

ANC1A supports these amendments for reasons similar to the reasons above.

- **Policy E-2.1.1: Trees in the Public Lands**

- ANC1A supports the changes to this policy which aims to increase the District tree canopy by planting trees on public lands in areas with inadequate tree cover

- **Policy E-2.1.3: Sustainable Landscaping Practices**

ANC1A supports the new text for this Policy, particularly the focus on native trees and plants as well as leveraging public right-of-ways and other District owned property

- **Action E-3.2.H: Solar Easements**

ANC 1A supports prioritizing the review and modification of zoning ordinances and other relevant city regulations to remove barriers to the use of solar energy systems and to ensure access to solar.

- **Policy E-3.3.1: Solid Waste Source Reduction and Recycling, Policy E-3.3.3: Organic Waste Diversion, the addition of Policy E-3.3.4: Regional Approach to Solid Waste Reduction, and the addition of Policy E-3.3.5: Promote Product Stewardship**

ANC1A strongly supports District and regional efforts to meet the District's goal of reducing and diverting 80% of waste by 2032, including the creation of extended producer responsibility (EPR) programs, as well as the creation of curbside residential composting, with processing facilities located either within or outside of the District, for single-family and multi-family residences serviced by DPW.

- **Action 3.3.L: Reduce Residential Construction and Demolition Waste**

ANC1A strongly supports this new Action in the Comprehensive Plan and urges that this be made a priority. We have witnessed the conversion of many century-old rowhouses into 2- and 3-living units. These conversions are often achieved by completely gutting the entire structure and recreating a new building within the structure's shell. Much, if not all, of the original material ends up in landfills. This is not environmentally sound. Furthermore, beautiful and valuable architectural elements – such as irreplaceable American Chestnut stairways and paneling – are among the materials destroyed and carted away as waste. Establishing incentives and outlets to save and recycle these valuable architectural elements is strongly supported.

General Support

After careful review and consideration, ANC1A supports the inclusion or deletion of the following language in the following Policies and Actions:

- Inclusion of “and private” in *Action E-2.1.A: Tree Replacement Program*
- Inclusion of “bio-retention tree boxes” in *Action E-2.1.B: Street Tree Standards*
- Removal of “Downtown DC and other” in *Action E-3.3.D: Installation of Sidewalk Recycling Receptacles* (this effort needs to be city-wide)
- Support updated text for *Action E-4.1.C: Road Construction Standards*, and particularly support the inclusion of “installing bio retention tree boxes and bump outs”

ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Environmental Protection
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ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

Certification:

After providing sufficient notice for and with a quorum of 9 present at its January, 8, 2020, meeting,
Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 9 Yeas 0
Nays 0 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



ADVISORY NEIGHBORHOOD COMMISSION 1A

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SMD 1A06 – Angelica Castañon
SMD 1A09 – Michael Wray
SMD 1A12 – Jason Clock

January 8, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Historic Preservation Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following recommendations and proposed amendments to the District of Columbia Comprehensive Plan's Historic Preservation Element.

After careful review of the proposed changes to the Historic Preservation Element, ANC1A **Supports** the following proposed Policy amendments:

- Policy HP-1.6.5: Commercial Signage

Control commercial signage to avoid the visual blight of billboards and intrusion upon the city's monumental grandeur and residential neighborhoods. Support the city's economic vitality and quality of life through carefully considered policies and regulations for commercial signage in designated entertainment areas; and,

- Policy HP-2.5.2: Adaptation of Historic Properties for Current Use

Maintain historic properties in their original use to the greatest extent when possible. If this is no longer feasible, Alternatively, encourage appropriate adaptive uses consistent with the character of the property. Recognize the value and necessary function of special purpose structures such as utility buildings, and allow structural modifications and other alterations consistent with historic character, when needed for the property to continue functioning in its original use.;

After careful review of the proposed changes to the Historic Preservation Element, ANC1A **Supports** the following proposed Action amendments:

- Action HP-2.8.A: Preservation and Climate Change

Complete an inventory of historic and culturally significant sites threatened by climate change. Give priority to these at-risk sites in developing hazard mitigation plans. Coordinate with key stakeholders to maximize use of available funding for mitigation and disaster response projects;

- Action HP-3.2.H: Appreciating Cemeteries
- Collaborate with cemetery administrators to reconnect burial grounds to their surrounding neighborhoods for greater public access. Promote cemeteries for purposes of tourism and

low-impact recreation such as walking. Create online guides of distinguished monuments and notable Washingtonians buried in local cemeteries; and,

- Action HP-4.2.B: Tax Credits for Affordable Housing in Historic Buildings Encourage the coordinated use of multiple tax credits to support rehabilitation of existing affordable housing in historic buildings, and to create new affordable units in historic buildings. Support such projects through historic designation of buildings meeting the eligibility criteria.

After careful review of the proposed changes to the Historic Preservation Element, ANC1A ***Recommends*** the following language and/or goals be considered for inclusion in the text submitted to the Council for approval:

- Add the language “Make Historic Preservation Plan readily available to the public” to Policy HP-1.1.1 , which currently states: D.C. Historic Preservation Plan Maintain and periodically update the District of Columbia Historic Preservation Plan according to the standards required by the National Park Service for approved state historic preservation plans. Ensure that the Historic Preservation Plan remains consistent and coordinated with the Comprehensive Plan as both are updated;
- Add language similar to “Create process for public reporting of errors and updates to HistoryQuest DC” to Action HP-1.3.A, which currently states: Database of Building Permits Continue the development of a computer Expand HistoryQuest DC, the HPO digital database of information from the complete archive of 19th and 20th century District of Columbia building permits, and use this information as a foundation for survey efforts to include major alteration permits and permits issued after 1949. Update Internet access to this information as new data is compiled. While HistoryQuest DC does have a “propose data change” link at the top of the application, it does not stand out and is easy to overlook. It needs to be easily recognizable and intuitive to be useful.

Finally, ANC1A submits the following Amendments for consideration and ***Recommends*** that they be included in the Comprehensive Plan:

- Include language to the Historic Preservation Element and sections related to Parks and Open Space and Arts and Culture as a Policy and an Action to Install and Restore Historic Statuary to Relevant Sites when possible. To maintain the District’s unique culture and history, efforts should be undertaken to identify statuary, fountains, and public art historically linked to the District and work with the Federal Government and other entities to return these works to sites associated with their history. Relevant examples include Washington’s first Steuben monument on Georgia Avenue, or the McMillan and Truxton Circle fountains. Additionally, new public sculpture related to neighborhood history or important Washingtonian’s should be encouraged and sited within the neighborhoods where there is a historical connection;
- Include language in the Historic Preservation Element that requires the inclusion of historical markers and interpretive signage as part of any capital improvement projects undertaken by the District of Columbia for properties owned by the District of Columbia that are on the DC Inventory of Historic Properties and/or the National Register;
- Include language to the Historic Preservation Element and sections related to Planned Unit Developments, and all other relevant areas of the Comprehensive Plan, allowing for bonus density for projects that preserve and incorporate historic facades in commercial corridors located

outside of Historic Districts. Historic facades help create a sense of place and continuity in every neighborhood. Development that chooses to preserve and incorporate architecturally important and/or beautiful facades outside of Historic Districts should receive zoning flexibility for greater density as an incentive.

- Include a staff member of the Historic Preservation Office as part of the Office of Planning design review team on Zoning Cases and cases before the Board of Zoning Adjustment that require opinions on original rooftop and architectural features for structures built prior to 1925. It is ANC1A's experience that OP does not regularly consult with HPO staff in a genuine and meaningful way when addressing issues of original architectural features during the zoning process. Inclusion of HPO staff and their expertise is essential to the process; and,
- Expand Policy HP-2.2.5 to be across the entire District of Columbia and not limited solely to Historic Districts. The text currently reads:

Ensure that new public works such as street lights, street furniture, and sidewalks within historic landscapes and historic districts are compatible with the historic context.
Emphasize good design whether contemporary or traditional.

The Comprehensive Plan's emphasis on **EQUITY**, the historic importance of the Plan of the City of Washington, and the importance of protecting historic vistas means that every street in every neighborhood is historic in nature. As streets throughout the District of Columbia are public lands owned and maintained by government, they should be equitably managed and have equitable investment. As a result, well-designed street lights, street furniture, and sidewalks in every neighborhood throughout D.C should emphasize good design and be compatible with the architectural character of their neighborhoods. Residents who do not live in historic districts or who live in lower income neighborhoods are equally deserving of living in beautiful neighborhoods with high-quality materials and investment from their government. In this matter, the District of Columbia must adopt a single standard for new public works in public space across the entire city.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

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Certification:

ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Historic Preservation
Element

January 8, 2020

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After providing sufficient notice for and with a quorum of 9 present at its January, 8, 2020, meeting,
Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 9 Yeas 0
Nays 0 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



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January 8, 2020

(via email only)

Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Comments and Recommendations on Amendments to the DC Comprehensive Plan's Economic Development Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following responses, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Economic Development Element.

Recommendations

After careful review and consideration, ANC1A ***Recommends*** the following response to the proposed amendments to the Economic Development Element of the Comprehensive Plan and requests that OP review and address ANC1A's comments

- **Policy ED-1.1.5: Use of Large Sites:** While the Commission recognizes the opportunities that large sites have for housing and commerce; we equally note that each large site has a unique relationship to its surrounding neighborhoods. We want to emphasize that amenities including public parks and open space can be just as valuable as other uses. This is especially true with the Armed Forces Retirement Home, which was open to public use for the Park View and Petworth neighborhoods during their original construction. This resulted in a lack of park space being established in these neighborhoods. In such a scenario, establishing new public parks reduces the demand for public parks on the Georgia Avenue corridor – an area zoned for commercial uses and higher density. Each large site needs to be reviewed within its regional/neighborhood context so that any resulting development will have outcomes that are equitable, neighborhood serving, and supportive of the District's long-term goals.
- **Street Vending and Action ED-1.1.C: Business Support Structures:** A need currently receiving a lot of community attention and not addressed in the Comprehensive Plan is **Street Vending**. It makes sense that language be added to either this action or elsewhere in the Economic Development element addressing the inequity and barriers street vendors currently face. In 2018, California legalized sidewalk vending and required municipalities to regulate it. The L.A. Council decriminalized street vending in 2017 due to concerns that having it remain illegal put sellers at risk of deportation. Chicago has also legalized food cart vending. Lastly, New York has existing legislation that would make it easier for street vendors to operate, including an

ability-to-pay provision which allows a person to complete community service in lieu of paying the total fine. If the Comprehensive Plan is forward looking, it needs to include language addressing street vending in DC.

- **Need to Geographically Broaden/Expand Daytime Office Jobs:** We recommend that OP review and amend the Comprehensive Plans language related to daytime office jobs, particularly in *Policy ED-3.1.1: Neighborhood Commercial Vitality*, *Policy ED-2.1.1: Office Growth*, *Policy ED-2.1.6: Lower Cost and Flexible Office Space*, *Policy ED-2.3.3: Amenities Beyond the Mall*, *Policy ED-2.2.3: Neighborhood Shopping*, and other sections of the element. ANC1A agrees with the Comprehensive Plan's goals of growing a "strong customer base through residential density" and strengthening the customer base in neighborhoods to support local businesses. However, the Comp Plan's over reliance on growing residential density fails to identify a linkage between growing office jobs in neighborhoods with supporting local businesses. The challenge that exists in commercial areas such as U Street, Georgia Avenue, and other sections of Ward 1 is that residents migrate out of the community for employment during the day and return to their homes at night. A similar in-migration for jobs does not occur. This leaves these commercial corridors with limited commercial support and an unhealthy/imbalanced commercial environment during the day despite being surrounded by a growing "residential density." Efforts need to be undertaken to increase daytime commerce by growing daytime office jobs in every neighborhood and not just in the downtown commercial core.
- **Need for Zoning and Planning Review of Commercial Corridors:** *Policy ED-2.2.7: Planning For Retail* and *Policy ED-2.2.9: Clustered Retail at Transit* emphasize the importance and opportunity of commercial corridors and transit hubs to small businesses, and ANC1A agrees. However, to achieve these goals on corridors such as Georgia Avenue between Florida and Rock Creek Church Road, there needs to be a strategic plan that include a review of planning and zoning for the corridor. Historically, the east side of Georgia Avenue developed as residential, with small one-room storefronts eventually getting construction in front of rowhouses during the early 20th century. This presents a number of challenges, including 1) the existing commercial spaces are not large enough to accommodate modern business needs, 2) the properties are not large enough to support the development needed to support modern commerce on the corridor, and even when parcels are assembled, they are shallow lots requiring the assembly of 3 or more parcels which is very difficult to do, and 3) the surrounding infrastructure is inadequate for sidewalk cafes and other desirable features for modern commercial need. Because of these challenges, OP and the Comp Plan must create an active roadmap – including recommendations for zoning amendments and planning priorities – rather than merely state that this is a priority.
- **Policy ED-3.2.6: Commercial Displacement and Action ED-3.2.A: Anti-Displacement Strategies:** ANC1A is extremely supportive of the addition of "technical assistance, building purchase assistance" to Action ED-3.2.A and the recognition that more needs to be done to address commercial displacement of local small businesses. We have long felt that efforts to provide grants to businesses to cover rising rents will not lead to income or long-term stability as property owners can always raise rents in the future. Instead, providing opportunities for businesses to own their own properties can achieve financial security reduce the impact of inflation. While property ownership is the desired goal, additional language outlining opportunities and assistance to improve commercial properties beyond facades is also needed, as many older properties suffer from disinvestment from landlords – and new owners will likely also need capital to repair deferred maintenance.

- **Policy ED-2.3.7: Visitor Information Services:** We like this policy but note that this is an old policy and not a new amendment. We are commenting here primarily because we see the benefit of visitor information services in communities and are disappointed that Columbia Heights has not benefited from this policy. We recommend that OP consider adding language for an Action item providing guidance on how to increase visitor services in neighborhoods. For example, in Columbia Heights it would make sense to use one of the commercial spaces surrounding the Civic Plaza as a visitor center, providing visitor services, public restrooms, staff to maintain the plaza, and office space for the local Main Street program – all under one roof. Such a use leverages and supports goals found in several Comp Plan elements and needs to be a priority for the District.
- **Action ED-4.1.A: Master Education Plan and Policy ED-4.1.6: Agency Coordination:** The Commission is pleased to see the Comp Plan recognizes the linkage between education, training, and employment. We feel the language in these areas can be strengthened by recognizing that every student isn't college bound, and many trades provide opportunities for meaningful and lucrative employment. We encourage OP to include language that recognized the value and need for education resulting in skilled tradesmen, especially in the hospitality, construction, and building trades – trades that closely align with the District's growing economy and employment opportunities.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

####

Certification:

After providing sufficient notice for and with a quorum of 9 present at its January, 8, 2020, meeting, Advisory Neighborhood Commission 1A adopted this resolution with vote as follows. 9 Yeas 0 Nays 0 Abstentions



Kent C. Boese
Chairperson, ANC 1A



Zachary Rybarczyk
Secretary, ANC 1A

ANC1A Recommendations on Amendments to the DC Comprehensive Plan's Economic Development
Element

January 8, 2020

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cc: Andrew Trueblood, Director, Office of Planning
plandc@dc.gov
Phil Mendelson, Chairman, Council of the District of Columbia
Gottlieb Simon, Director, Office of Advisory Neighborhood Commissions



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January 8, 2020

(via email only)
Andrew Trueblood, Director
Office of Planning
1100 4th St SW
Washington, DC 20024

RE: ANC1A Comments and Recommendations on Amendments to the DC Comprehensive Plan's Community Services and Facilities Element

Dear Director Trueblood,

On the evening of January 8, 2020, at a properly noticed meeting with a quorum present, ANC1A considered and approved the following responses, recommendations, and proposed amendments to the District of Columbia Comprehensive Plan's Community Services and Facilities Element.

General Comments

Overall, ANC1A agrees with and supports many of the amendments outlined in the draft element – particularly in the areas of public health and public safety. As we are not experts in these areas, however, we are refraining from submitting deeper comments so that recommendations from knowledgeable professionals and organizations can receive greater attention and consideration.

Recommendations

After careful review and consideration, ANC1A ***Recommends*** that language be added to the Community Services and Facilities Element and all other relevant areas of the Comprehensive Plan addressing and incorporating the following issues and goals:

- **Facility Master Planning for Recreation Centers:** The Commission notes that Facility Master Planning is emphasized in this element in a number of areas. Notably generally in *Action CSF-1.2.C: Coordinate Facilities Master Planning with Civic Facilities Planning*, for libraries in *Action CSF-3.1.F: Facilities Master Plan*, and with FEMS planning. In the *Parks, Recreation, and Open Space element* we recognize that master planning of the larger network of parks and open space is identified, but we have been unable to find language specifically addressing the need for master planning of recreation centers themselves. As these are facilities, it makes sense for this need to be addressed in the Community Services and Facilities element. Due to funding constraints, ANC1A is aware that capital improvement projects for recreation centers tend to be undertaken in phases – without a guiding master plan. The result is and will continue to be inferior outcomes and due to short-term budget constraints. The two examples below illustrate the need to have a strong master plan for recreation center capital improvement projects:

- o Palisades Recreation Center: Improvements to the Palisades recreation center was completed in phases. The first phase was a full renovation of the playground east of the facility. Later, in a separate modernization, the recreation building was enlarged to the southwest. As a historic building and park, a master plan in advance of these efforts could have produced a better outcome. The logical place for an addition to the building was to the east and historic plans from the 1950s show such an extension. However, as a new playground had already been installed there this was no longer a desirable option.
- o Park View Recreation Center: Similar to the Palisades example above, when the outdoor spaces of the Park View center were last renovated, the community asked for a master plan for the entire site. It was recognized then that a new recreation building would be needed and money is currently in the Capital Improvement Budget for a new building in a few years. However, the site of the current facility is not ideally located, and a new building would better serve the community on another part of the park property. This means that money spent for the earlier outdoor improvements will either limit the siting options for the new building or have been spent for a lesser return on the investment due to the earlier refusal of DPR to develop a master plan for the site.

Overall, we note that section of this element where language addressing the issue could be amended includes Policy CSF-1.2.1: Capital Improvement Programming, Policy CSF-1.2.2: Strengthening Links between the Comp Plan and Capital Improvement Program, Policy CSF-1.2.3: Construction and Rehabilitation, and Action CSF-1.2.C: Coordinate Facilities Master Planning with Civic Facilities Planning.

- **Policy CSF-2.3.9: Improving Access to Long-Term Supports and Services for Vulnerable Populations** and **Action CSF-2.3.D: Improving Coordination and Service Delivery among District Agencies:** The Commission welcomes this policy and action item. However, we urge OP to include language that references and/or recognizes that vulnerable populations include many members of the LGBTQ community and their needs need to be included in any effort to “create and implement a cross-agency case management system that can enhance coordination among relevant agencies to improve service delivery.” For example, in health care and services LGBT patients often are overlooked as a group that faces disparities. However, like other populations identified as at-risk or disadvantaged, the lesbian, gay, bisexual and transgender community has faced stigma, lack of cultural competence and insensitivity to their unique needs. ANC1A asks that language be added to the Comp Plan to ensure that these needs are equally considered among efforts to address service for every vulnerable population in the District of Columbia.

Support

After careful review of the proposed changes to the Community Services and Facilities Element, ANC1A ***Supports*** the following proposed Policy and Action amendments:

- ***Policy CSF-1.1.9: Co-Location*, *Policy CSF-4.1.4: Public-Private Partnerships for Police Facilities*, and *Policy CSF-4.2.2: Public-Private Partnerships for Fire and Emergency Medical Services and Facilities***

ANC1A strongly supports these policies and has long advocated for co-location of uses to better meet the needs of our community and a growing city. The MPD 3D station on V Street, Engine Co. No. 11 on 14th Street, and Engine Co. No. 9 on U Street are prime examples of District-owned properties which are not currently delivering their highest and best use. All three sites can support

considerably more density while maintaining their current services – resulting in more needed housing, commercial spaces, and/or space for community services.

- ***Policy CSF-3.1.2: Libraries as Civic Infrastructure, Policy CSF-3.1.4: Tailoring Libraries to the Neighborhoods They Serve, and Action CSF-3.1.D: Libraries and Local History:*** ANC1A strongly supports the inclusion of these amendments, and applauds OP for recognizing the vital role of libraries as community centers, exhibition spaces for artists, performing arts spaces, and a host of other activities and programs that are beyond books. Healthy communities have public spaces where neighbors gather, share ideas and culture, and build consensus for community action. As more and more of these spaces have closed over the years, libraries have become ever increasingly valuable community assets. In some communities, the local library has the only publicly available space for ANC meetings and other public meetings required by District Agencies. Because of this, we as that OP consider adding language to the Comp Plan stating that, when possible, large public meeting spaces in libraries be designed with direct street access in addition to internal access. This would allow for meeting in these spaces to operate beyond regular operating hours of the library or on days when branch libraries close early.

ANC1A welcomes the opportunity to discuss our support and recommendations with the Office of Planning and thank you for your consideration.

Most sincerely,



Commissioner Kent C. Boese
Chair, Advisory Neighborhood Commission 1A

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